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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
et al.,

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS,  
et al.,

Defendants.

Case No. 3:16-cv-00236-WHO

**PLAINTIFFS SUBMISSION OF  
REDACTED EXHIBITS AS ORDERED BY  
THE COURT (DKT. NO. 539)**

In accordance with this Court's order, Plaintiffs hereby file revised versions of Exhibits 1, 2  
and 8 of the Declaration of Michael Millen In Support of Albin Rhomberg's Motion for Summary  
Judgment.

1 DATED: April 26, 2019

ARNOLD & PORTER KAYE SCHOLER LLP

2  
3 By: /s/ Amy Bomse

4 AMY BOMSE

5 Attorneys for Plaintiffs

# **EXHIBIT 1**

1 AMY L. BOMSE (No. 218669)  
2 SHARON D. MAYO (No. 150469)  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

13 PLANNED PARENTHOOD FEDERATION OF  
14 AMERICA, INC., a not-for-profit corporation; and  
15 PLANNED PARENTHOOD: SHASTA-DIABLO,  
16 INC. dba PLANNED PARENTHOOD NORTHERN  
17 CALIFORNIA; PLANNED PARENTHOOD MAR  
18 MONTE, INC.; PLANNED PARENTHOOD OF THE  
19 PACIFIC SOUTHWEST; PLANNED PARENTHOOD  
20 LOS ANGELES; PLANNED  
21 PARENTHOOD/ORANGE AND SAN  
22 BERNARDINO COUNTIES, INC.; PLANNED  
23 PARENTHOOD OF SANTA BARBARA, VENTURA  
24 AND SAN LUIS OBISPO COUNTIES, INC;  
25 PLANNED PARENTHOOD PASADENA AND SAN  
26 GABRIEL VALLEY, INC.; PLANNED  
27 PARENTHOOD OF THE ROCKY MOUNTAINS;  
28 PLANNED PARENTHOOD GULF COAST AND  
PLANNED PARENTHOOD CENTER FOR CHOICE,

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS, BIOMAX  
PROCUREMENT SERVICES, LLC, DAVID  
DALEIDEN (aka "ROBERT SARKIS"), TROY  
NEWMAN, ALBIN RHOMBERG, PHIL CRONIN,  
SANDRA SUSAN MERRITT (aka "SUSAN  
TENNENBAUM"), GERARDO ADRIAN LOPEZ, and  
UNKNOWN CO-CONSPIRATORS, inclusive,

Defendants.

Case No. 3:16-cv-0236-WHO

**PLAINTIFFS' SECOND AMENDED  
INITIAL DISCLOSURES UNDER  
FED. R. CIV. PROC. 26(a)(1)**

**DESIGNATED HIGHLY  
CONFIDENTIAL—ATTORNEYS'  
EYES ONLY PURSUANT TO  
PROTECTIVE ORDER, DKT NO.  
117**


1 Plaintiffs Planned Parenthood Federation of America, Inc. ("PPFA"), Planned Parenthood:  
2 Shasta-Diablo, Inc. dba Planned Parenthood Northern California ("PPNorCal"), Planned  
3 Parenthood Mar Monte, Inc. ("PPMM"), Planned Parenthood of the Pacific Southwest ("PPPSW"),  
4 Planned Parenthood Los Angeles ("PPLA"), Planned Parenthood/Orange and San Bernardino  
5 Counties, Inc. ("PPOSBC"), Planned Parenthood of Santa Barbara, Ventura and San Luis Obispo  
6 Counties, Inc. ("PPCCC"), Planned Parenthood Pasadena and San Gabriel Valley, Inc.  
7 ("PPPSGV"), Planned Parenthood of the Rocky Mountains ("PPRM"), Planned Parenthood Gulf  
8 Coast ("PPGC"), and Planned Parenthood Center for Choice ("PPCFC") (collectively, "Planned  
9 Parenthood" or "Plaintiffs") hereby submit their Amended Initial Disclosures to Defendants Center  
10 for Medical Progress, BioMax Procurement Services, LLC, David Daleiden, Troy Newman, Albin  
11 Rhomberg, Phillip S. Cronin, Sandra Susan Merritt, and Gerardo Adrian Lopez ("Defendants")  
12 pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

13 These disclosures are made prior to the completion of fact discovery after making in good  
14 faith such inquiry and investigation as is reasonable under the circumstances. Planned Parenthood  
15 expressly reserves the right to correct or supplement these disclosures should it subsequently  
16 become aware of additional relevant information to be disclosed. By making these disclosures,  
17 Planned Parenthood does not represent that it is identifying every document, tangible thing, or  
18 witness possibly relevant to this lawsuit. The disclosures contained herein are further made without  
19 waiving: (1) the right to object on any proper ground to the use of any information contained herein  
20 for any purpose in any subsequent proceeding in this action or any other action; and (2) the right to  
21 object on any and all grounds, at any time, to any other discovery request or proceeding involving  
22 or relating to the subject matter of these disclosures.

23 **I. WITNESSES**

24 Pursuant to Rule 26(a)(1)(A)(i), the following individuals are likely to have discoverable  
25 information that Planned Parenthood may use to support its claims or defenses, unless solely for  
26 impeachment. Planned Parenthood reserves the right to supplement or amend this list pursuant to  
27 Rule 26(e) and to call at trial as its own witnesses, any witnesses designated by Defendants, as well  
28

as any witness Defendants have deposed or sought to depose. To the extent that Defendants fail to call at trial any or all of the disclosed witnesses, Planned Parenthood reserves the right to introduce at trial relevant portions of their deposition testimony.

Name	Contact Information	Subject Matter
Deb VanDerhei National Director, Consortium of Abortion Providers, PPFA	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
Dr. Carolyn Westhoff Senior Medical Advisor for Medical Affairs, PPFA	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
Dr. Deborah Nucatola PPFA Senior Director, Medical Services; PPLA Physician	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping, fraudulent misrepresentations, and wire and/or mail fraud.
Dawn Laguens PPFA Executive Vice President and Chief Experience Officer	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including fraudulent misrepresentations, wire and/or mail fraud, and Plaintiffs' conference security measures.
 PPFA Assistant Director, Events and Conferences	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including fraudulent misrepresentations, wire and/or mail fraud, and Plaintiffs' conference security measures.
Vikky Graziani PPFA Senior Manager of Finance and Operations	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including fraudulent misrepresentations, wire and/or mail fraud, and Plaintiffs' conference security measures.
Tom Subak PPFA Chief Strategy Officer and	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' damages involving Plaintiffs' website.

1	Assistant to the President		
2	Franklin Rosado	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' damages involving Plaintiffs' website.
3	PPFA Chief Information Officer		
4	Wallace D'Souza	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' damages.
5	PPFA Chief Financial Officer		
6	Melvin Galloway	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures and damages.
7	PPFA Chief Operating Officer		
8	Ellen Gertzog	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about security measures and damages.
9	PPFA National Director, Affiliate Security		
10	George Collins	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
11	PPLA Director of Security		
12	Dr. Mary Gatter	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping, fraudulent misrepresentations, and wire and/or mail fraud.
13	PPPSGV Medical Director		
14	Laurel Felczer	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping.
15	PPPSGV Senior Director of Medical Services		
16	██████████	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including fraudulent misrepresentations, mail and/or wire fraud, trespass, and Plaintiffs' healthcare center security measures.
17	PPPSGV Pasadena Health Center Manager		
18	██████████	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
19	PPSGV Security Director		
20	Dr. Jennefer Russo	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
21	PPOSBC Medical Director		

1	Jon Dunn	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
2	PPOSBC President and CEO		
3	Dr. Savita Ginde	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping.
4	PPRM Vice President, Chief Medical Officer		
5	John Duffy	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
6	PPRM Senior Vice President and CFO		
7	Melissa Farrell	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping, trespass, breach of contract, fraudulent misrepresentations, and wire and/or mail fraud
8	PPGC Research Director		
9	Melaney Linton	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping, trespass, breach of contract, fraudulent misrepresentations, wire and/or mail fraud, Plaintiffs' healthcare center security measures and damages.
10	PPGC and PPCFC Chief Executive Officer		
11	Larissa Lindsay	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' healthcare center security measures.
12	PPGC Senior Director of Security and Facilities		
13	Debbie Bamberger	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
14	PPNorCal Lead Clinician/Clinician Trainer		
15	[REDACTED]	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
16	PPNorCal Director of Facilities		
17	Dr. Katherine Sheehan	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
18	PPPSW Medical Director		
19	Austin Howe	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
20	PPPSW Director of Business Continuity,		



Emergency Preparedness, and Security		
Michelle Szymanski PPMM Program Director	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
RayRoz Dodson-Crawford PPMM Chief Financial Officer	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
Virginia Siegfried PPCCC Medical Director	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint, including Defendants' nonconsensual taping and fraudulent misrepresentations.
Yolanda Robles PPCCC Vice President Clinical Operations	This witness can be contacted or located through undersigned counsel only.	Facts regarding allegations in the First Amended Complaint about Plaintiffs' security measures.
NAF Witness	This witness can be contacted or located through NAF Counsel.	Facts regarding NAF conference security, NAF conference contracts and Non-disclosure agreements, NAF Violence and Disruptions Statistics
David Daleiden	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Troy Newman	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project"

		through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Sandra Susan Merritt	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Gerardo Adrian Lopez	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Albin Rhomberg	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and

		violations of privacy rights.
Phillip S. Cronin	Plaintiffs will approach this witness only through counsel of record.	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Holly O'Donnell	Unknown at this time	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Mark Crutcher	Unknown at this time	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the "Human Capital Project"; conspiracy and scheme among Defendants and unidentified individuals to carry out the "Human Capital Project" through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Sofia Mireles	Unknown at this time	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical

		Progress as related to the “Human Capital Project”; conspiracy and scheme among Defendants and unidentified individuals to carry out the “Human Capital Project” through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Unknown Individual identified as “Brianna Allen”	Unknown at this time	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the “Human Capital Project”; conspiracy and scheme among Defendants and unidentified individuals to carry out the “Human Capital Project” through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Unknown Individual identified as “Rebecca Wagner”	Unknown at this time	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the “Human Capital Project”; conspiracy and scheme among Defendants and unidentified individuals to carry out the “Human Capital Project” through illegal conduct, including but not limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
Catherine Short	Life Legal Defense Foundation P.O. Box 2105 Napa, CA 94558 707-224-6675 707-224-6676 (f)	Facts regarding all allegations in the First Amended Complaint, including the formation and operations of BioMax Procurement Services, LLC and Center for Medical Progress as related to the “Human Capital Project”; conspiracy and scheme among Defendants and unidentified individuals to carry out the “Human Capital Project” through illegal conduct, including but not

		limited to fraudulent misrepresentations and use of fake IDs to gain access to conferences and private meetings, breach of contracts, nonconsensual tapings, trespass, and violations of privacy rights.
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## II. DOCUMENTS AND THINGS

Pursuant to Rule 26(a)(1)(A)(iii), Plaintiffs identify the following categories of documents, electronically stored information, and tangible things:

1. Communications that relate to Defendants' attendance at Planned Parenthood conferences;
2. Communications between Plaintiffs and Defendants;
3. Documents regarding Plaintiffs' security measures at conferences;
4. Documents regarding Plaintiffs' security measures at their healthcare centers, clinical spaces, and offices;
5. Contracts with hotels where Planned Parenthood conferences were held;
6. Contracts between Plaintiffs and Defendants;
7. Handouts provided at Planned Parenthood conferences and/or NAF conferences;
8. Materials from Texas and Colorado Planned Parenthood affiliates regarding site visits by Defendants;
9. Documents regarding communications between Defendants and Planned Parenthood affiliates, their employees, or their staff members;
10. Documents regarding vandalism and arson on Plaintiffs' properties;
11. Documents regarding additional security for Plaintiffs' offices, clinics, and staff;
12. Documents regarding costs to respond to state investigation;
13. Documents regarding loss of staff time due to investigations and website hacking;
14. Documents regarding losses of opportunities to treat clients;
15. Documents regarding hacking of PPFA patient portal.
16. Human Capital Project videos and accompanying press releases.

1 **III. DAMAGES**

2 Pursuant to Rule 26(a)(1)(A)(iii), Plaintiffs identify the following categories of damages:

- 3 1. Costs of security assessments and additional security including physical and IT-  
4 related to protect Plaintiffs' patients, staff, information, offices and clinics in the  
5 wake of increased security incidences, violence and cyber attacks  
6 2. Grants for security enhancements to affiliates experiencing increased security threats  
7 as a result of CMP video smear (PPFA only)  
8 3. Costs of repairing and protecting PPFA website after hacking (PPFA only)  
9 4. Costs of repairing and protecting online appointment systems  
10 5. Loss of revenue due to hack of PPFA patient portal  
11 6. Staff time responding to video, security training, and responding to protests and  
12 increased security incidents  
13 7. Costs relating to vandalism to Plaintiffs' offices and clinics  
14 8. Costs of grief/stress hotline related to increased violence  
15 9. Costs related to state Investigation (PPGC only)  
16 10. Costs of enhancing security and vetting procedures for conferences (PPFA only)

17 A detailed itemization of Plaintiffs' damages is provided in Plaintiffs' Second Amended  
18 Response to Newman Interrogatory 20.

19 **A. Damages by Claim**

- 20 1. **FIRST Claim For Relief: (Violation Of Racketeer Influenced And**  
21 **Corrupt Organizations (Rico) Act, 18 U.S.C. §§ 1962(c) and 1962(d)) (By All Plaintiffs Against All Defendants)**

22 All damages by all Plaintiffs. See Second Amended Response to Newman Interrogatory 20.

- 23 2. **Second Claim For Relief (Violation Of 18 U.S.C. § 2511) (By All**  
24 **Plaintiffs Against Daleiden, Merritt, Lopez, CMP, BioMax, and Unknown Co-conspirators)**

25 All damages by all Plaintiffs. See Second Amended Response to Newman Interrogatory 20.  
26  
27  
28

1                   **3. Third Claim For Relief (Civil Conspiracy) (By All Plaintiffs Against All**  
2                   **Defendants)**

3                   All damages by all Plaintiffs claiming fraud. See Second Amended Response to Newman  
4 Interrogatory 20.

5                   **4. Fourth Claim For Relief (Breach Of Contract) (By PPFA Against**  
6                   **Daleiden, Merritt, Lopez, CMP, BioMax, and Unknown Co-**  
7                   **conspirators)**

8                   All damages by PPFA. See Second Amended Response to Newman Interrogatory 20.

9                   **5. Fifth Claim For Relief (Breach Of Contract) (By PPFA, PPNC, PPPSW,**  
10                  **PPMM, PPOSBC, PPGC, and PPCFC Against Daleiden, Merritt,**  
11                  **Lopez, CMP, BioMax, And Unknown Co-conspirators)**

12                  All damages by all Plaintiffs. See Second Amended Response to Newman Interrogatory 20.

13                  **6. Sixth Claim For Relief (Trespass) (By PPFA, PPGC, PPCFC, and PPRM**  
14                  **Against Daleiden, Merritt. Lopez, CMP, BioMax, and Unknown Co-**  
15                  **conspirators)**

16                  All damages by PPFA, PPGC/PPCFC and PPPSGV. See Second Amended Response to  
17 Newman Interrogatory 20.

18                  **7. Eighth Claim For Relief (Fraudulent Misrepresentation) (By PPFA,**  
19                  **PPGC, PPCFC, and PPRM Against Daleiden, Merritt, LOPEZ, CMP,**  
20                  **BioMax, and Unknown Co-conspirators)**

21                  All damages by PPFA, PPGC/PPCFC and PPPSGV. See Second Amended Response to  
22 Newman Interrogatory 20.

23                  **8. Ninth Claim For Relief (Violation Of California Penal Code § 632) (By**  
24                  **PPFA, PPNORCAL, PPPSW, PPMM, PPOSB, PPGC, PPCFC and**  
25                  **PPRM Against Daleiden, Merritt, Lopez, CMP, BioMax, and Unknown**  
26                  **Co-conspirators)**

27                  All damages by PPOSBC, PPNorCal, PPFA, PPLA, PPCFC, PPSGV or in the alternative,  
28 statutory damages for each violation. See Second Amended Response to Newman Interrogatory 20.

29                  **9. Tenth Claim For Relief (Violation Of California Penal Code § 634) (By**  
30                  **PPFA, PPNORCAL, PPPSW, PPMM, PPOSB, PPGC, PPCFC, and**  
31                  **PPRM Against Daleiden, Merritt, Lopez, CMP, BioMax, and Unknown**  
32                  **Co-conspirators)**

33                  All damages by PPOSBC, PPNorCal, PPFA, PPLA, PPCFC, PPSGV or in the alternative,  
34 statutory damages for each violation. See Second Amended Response to Newman Interrogatory 20.

1  
2 **10. Eleventh Claim For Relief (Violation Of Section 934 Title Xlvii Of The**  
3 **Florida Criminal Procedure Law) (By All Plaintiffs Against Daleiden,**  
4 **Merritt, Lopez, CMP, BioMax, and Unknown Co-conspirators)**

5 All damages by PPFA, PPLA, PPOSBC, PPPSW, PPGC, PPCCC, PPRM or in the  
6 alternative, statutory damages for each violation. See Second Amended Response to Newman  
7 Interrogatory 20.

8 **11. Twelfth Claim For Relief (Violation Of § 10-402 Of The Courts And**  
9 **Judicial Proceedings Article Of The Maryland Annotated Code) (By**  
10 **PPFA, PPNORCAL, PPPSW, PPMM, PPOSB, PPGC, PPCFC, and**  
11 **PPRM Against Daleiden, Merritt, Lopez, CMP, BioMax, and Unknown**  
12 **Co-conspirators)**

13 All damages by PPFA, PPGC/ PPCFC, PPLA or in the alternative, statutory damages for  
14 each violation. See Second Amended Response to Newman Interrogatory 20.

15 **12. Fifteenth Claim For Relief (Breach Of Non-Disclosure And**  
16 **Confidentiality Agreement) (By PPGC and PPCFC Against BioMax,**  
17 **Daleiden, and Merritt)**

18 All damages by PPGC and PPCFC. See Second Amended Response to Newman  
19 Interrogatory 20.

20 **B. Methodology for non-out-of-pocket expenses**

21 Staff time: number of hours multiplied by staff member's hourly rate if applicable or by  
22 proportion of time spent for salaried staff

23 Loss of opportunity to serve patients: comparison of actual number of patients versus  
24 expected number of patients, multiplied by average net revenue for medical services received on a  
25 per patient basis.

26 Plaintiffs' investigation and computation of its damages is ongoing and will be provided at  
27 such time as set forth in the case management order.  
28



1 DATED: October 1, 2018

Respectfully submitted,

2 ARNOLD & PORTER LLP

3  
4 By:



Amy Bomse  
Attorneys for Plaintiffs

# **EXHIBIT 2**

AMY L. BOMSE (No. 218669)  
SHARON D. MAYO (No. 150469)  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION OF  
AMERICA, INC.; PLANNED PARENTHOOD:  
SHASTA-DIABLO, INC. dba PLANNED  
PARENTHOOD NORTHERN CALIFORNIA;  
PLANNED PARENTHOOD MAR MONTE, INC.;  
PLANNED PARENTHOOD OF THE PACIFIC  
SOUTHWEST; PLANNED PARENTHOOD LOS  
ANGELES; PLANNED PARENTHOOD/ORANGE  
AND SAN BERNARDINO COUNTIES, INC.;  
PLANNED PARENTHOOD OF SANTA BARBARA,  
VENTURA AND SAN LUIS OBISPO COUNTIES,  
INC; PLANNED PARENTHOOD PASADENA AND  
SAN GABRIEL VALLEY, INC.; PLANNED  
PARENTHOOD OF THE ROCKY MOUNTAINS;  
PLANNED PARENTHOOD GULF COAST AND  
PLANNED PARENTHOOD CENTER FOR CHOICE,

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS; BIOMAX  
PROCUREMENT SERVICES, LLC; DAVID  
DALEIDEN (aka "ROBERT SARKIS"); TROY  
NEWMAN; ALBIN RHOMBERG; PHILLIP S.  
CRONIN; SANDRA SUSAN MERRITT (aka "SUSAN  
TENNENBAUM"); GERARDO ADRIAN LOPEZ; and  
UNKNOWN CO-CONSPIRATORS, inclusive,

Defendants.

Case No. 3:16-cv-00236-WHO

**PLAINTIFFS' SECOND AMENDED  
RESPONSE TO DEFENDANT TROY  
NEWMAN'S SECOND SET OF  
INTERROGATORIES  
PROPOUNDED ON EACH  
PLAINTIFF**

**CONFIDENTIAL**

1 PROPOUNDING PARTIES: Defendant Troy Newman

2 RESPONDING PARTIES: Plaintiffs Planned Parenthood Federation of America, Inc.;  
3 Planned Parenthood: Shasta-Diablo, Inc. dba Planned  
4 Parenthood Northern California; Planned Parenthood Mar  
5 Monte, Inc.; Planned Parenthood of the Pacific Southwest;  
6 Planned Parenthood Los Angeles; Planned Parenthood  
7 California Central Coast (formerly Planned Parenthood/Orange  
8 and San Bernardino Counties, Inc.); Planned Parenthood of  
9 Santa Barbara, Ventura and San Luis Obispo Counties, Inc.;  
10 Planned Parenthood Pasadena and San Gabriel Valley, Inc.;  
11 Planned Parenthood of the Rocky Mountains; Planned  
12 Parenthood Gulf Coast; and Planned Parenthood Center for  
13 Choice (collectively "Plaintiffs")

14 SET NUMBER: TWO

15 Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Civil Rules of the  
16 United States District Court for the Northern District of California, Plaintiffs Planned Parenthood  
17 Federation Of America, Inc. ("PPFA"); Planned Parenthood: Shasta-Diablo, Inc. dba Planned  
18 Parenthood Northern California ("PPNorcal"); Planned Parenthood Mar Monte, Inc. ("PPMM");  
19 Planned Parenthood Of The Pacific Southwest ("PPPSW"); Planned Parenthood Los Angeles  
20 ("PPLA"); Planned Parenthood California Central Coast ("PPCCC," formerly Planned  
21 Parenthood/Orange and San Bernardino Counties, Inc.); Planned Parenthood Of Santa Barbara,  
22 Ventura And San Luis Obispo Counties, Inc. ("PPOSBC"); Planned Parenthood Pasadena And San  
23 Gabriel Valley, Inc. ("PPPSGV"); Planned Parenthood Of The Rocky Mountains ("PPRM");  
24 Planned Parenthood Gulf Coast ("PPGC"); and Planned Parenthood Center For Choice (collectively  
25 "Plaintiffs") hereby object and respond to Defendant Troy Newman's First Set Of Interrogatories  
26 (the "Interrogatories"), served by Defendant Troy Newman ("Defendant") on Plaintiffs on April 15,  
27 2016.<sup>1</sup>

### 28 PRELIMINARY STATEMENT

Plaintiffs provide these objections and amended responses based upon the investigation  
conducted in the time available since service of the Interrogatories. As of the date of these

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<sup>1</sup> The original responses were erroneously titled "Amended Responses." This is the first amendment to the original responses, and to avoid any confusion, this set will be referred to as "First Amended Responses" to the second set of interrogatories.

1 objections and amended responses, Plaintiffs have not had a sufficient opportunity to review all  
2 documents, interview all personnel and/or otherwise obtain information that may prove relevant in  
3 objecting and responding the Interrogatories. As a consequence, these objections and amended  
4 responses are based upon information now known to Plaintiffs and that Plaintiffs believe to be  
5 pertinent in objecting and responding to the Interrogatories. In the future, Plaintiffs may discover or  
6 acquire additional information bearing on the Interrogatories, and Plaintiffs' objections and  
7 amended responses thereto. Without in any way obligating itself to do so, Plaintiffs reserve the  
8 right: (a) to make subsequent revisions or further amendments to its objections or these Responses  
9 based upon information, evidence, documents, facts and/or other things that hereafter may be  
10 discovered, or the relevance of which may hereafter be discovered; and (b) to produce, introduce, or  
11 rely upon additional or subsequently acquired or discovered writings, evidence and information in  
12 any proceedings or at any trial held hereafter.

13 Further, any response by Plaintiffs to a particular Interrogatory is not intended, and shall not  
14 be construed, as an admission of the existence of any fact, of any assertion, or of any other matters  
15 expressed or implied in the Interrogatory. Plaintiffs' objection to, or failure to object to, any  
16 particular Interrogatory is not, and shall not be construed as, an admission that responsive  
17 information exists. Moreover, Plaintiffs' decision to consent to the production of information  
18 pursuant to any specific Interrogatory, notwithstanding the objectionable nature of any such  
19 Interrogatory, or its related definitions or instructions, also should not be construed as: (a) a  
20 stipulation that the material is relevant to any proceeding, (b) a waiver of the general or specific  
21 objections asserted to the Interrogatory, or (c) an agreement that future requests for similar  
22 information will be treated in a similar manner. Subject to and without waiving these objections,  
23 Plaintiffs agree to meet and confer with Defendant to attempt to resolve these objections and  
24 appropriately narrow the scope of these Interrogatories.

25 Plaintiffs incorporate this Preliminary Statement into each objection and amended response  
26 below as if set forth in its entirety.

### 27 **GENERAL OBJECTIONS**

28 Plaintiffs make the following General Objections, which are expressly incorporated into

1 each of the Objections to the Definitions, Instructions, and Specific Interrogatories below as though  
2 set forth in full and without waiving these General Objections:

3 1) Plaintiffs object that the Interrogatories are overly broad and unduly burdensome,  
4 and that the relevance, if any, of the requested information is outweighed by the burden that  
5 compliance would place on Plaintiffs.

6 2) Plaintiffs object to the extent that the Interrogatories call for information previously  
7 disclosed pursuant to, and protected by, protective orders and/or confidentiality agreements entered  
8 in prior litigations or investigations. Plaintiffs will comply with those protective orders and/or  
9 confidentiality agreements in responding to the Interrogatories.

10 3) Plaintiffs further object that Defendants have failed to take reasonable steps to avoid  
11 imposing undue burden or expense on Plaintiffs, particularly with respect to overbroad requests that  
12 seek identification of "all documents" relating to certain subjects.

13 4) Plaintiffs object that the Interrogatories call for the disclosure of information covered  
14 by non-disclosure and/or confidentiality agreements with third-parties and/or would violate the  
15 privacy interests of others. Plaintiffs will provide such information only after providing notice and  
16 opportunity for such third-parties to object, or pursuant to the terms of a suitable protective order if  
17 such notice and opportunity to object has already been provided.

18 5) Plaintiffs object that the Interrogatories seek information that is available through  
19 less burdensome means of discovery or other sources in that the information requested is: (a) in the  
20 possession, custody or control of other parties or non-parties; and/or (b) publicly available or  
21 otherwise equally available to Defendants. Plaintiffs will provide responses only to the extent that  
22 such information is in the possession, custody or control of Plaintiffs.

23 6) Plaintiffs object to the Interrogatories to the extent that they are vague, ambiguous,  
24 oppressive, designed to annoy or harass, do not describe the information to be produced with  
25 reasonable particularity, impose on Plaintiffs an unreasonable burden of inquiry, or require  
26 Plaintiffs to incur substantial expense in order to comply.

27 7) Plaintiffs object to the Interrogatories to the extent that they call for the disclosure of  
28 information that is not relevant to the subject matter of this action, not relevant to a claim or defense

1 of any party to this action, or not reasonably calculated to lead to the discovery of admissible  
2 evidence.

3 8) Plaintiffs object that the Interrogatories do not contain any assurance that Plaintiffs  
4 will be compensated for any of the costs, including attorneys' fees, they will incur in responding.

5 9) Plaintiffs object that the Interrogatories seek information protected from disclosure  
6 by the attorney-client privilege, the attorney work-product doctrine, and/or other privileges,  
7 immunities, and legal protections against disclosure. Nothing contained herein is intended to be,  
8 nor shall in any way be construed as, a waiver of any attorney-client privilege, work-product  
9 doctrine, right to privacy, or any other applicable privilege, doctrine, law, immunity, or rule  
10 protecting information from disclosure. To the extent that Plaintiffs disclose information in  
11 response to the Interrogatories, such disclosure is not intended to waive any privilege, right to  
12 privacy, or other applicable protection with respect to any document produced. Pursuant to Fed. R.  
13 Evid. 502(d), in the event that a privileged or otherwise protected document is inadvertently  
14 identified by Plaintiffs, such identification shall be deemed inadvertent and shall not constitute a  
15 waiver of Plaintiffs' rights to assert the applicability of any privilege for such document. Plaintiffs  
16 reserve the right to demand the return of any such document and all copies thereof.

17 10) Plaintiffs object that the Interrogatories purport to impose requirements, burdens,  
18 and/or discovery obligations that exceed those permitted by the Federal Rules of Civil Procedure  
19 and Judge Orrick's individual practices.

20 11) Plaintiffs object that the Interrogatories are unreasonably cumulative or duplicative.

21 12) Plaintiffs object to the Interrogatories to the extent that they purport to require  
22 Plaintiffs to ascertain the knowledge, however limited or tangential, of each and every individual  
23 employed by Plaintiffs at every level of authority or responsibility, relating to the subject matter of  
24 these Interrogatories.

25 13) Plaintiffs object that the Interrogatories are based on incorrect factual assertions and  
26 therefore lack foundation.

27 14) Plaintiffs object to the Interrogatories to the extent they seek information, or the  
28 compilation of data, that may be derived or ascertained from business records, where the burden of

1 deriving or ascertaining the answers thereto is substantially the same for Defendant as for Plaintiffs.

2 15) Plaintiffs object to the Interrogatories to the extent that they fail to provide a  
3 specified period of time and therefore are overbroad, vague, ambiguous, and unduly burdensome.  
4 Plaintiffs will conduct a reasonable investigation of information from January 1, 2011 until the date  
5 of service of these Interrogatories, as applicable to a particular Interrogatory.

6 16) Plaintiffs' objection to or failure to object to any particular Interrogatory is not, and  
7 shall not be construed as, an admission that responsive information exists.

8 17) Plaintiffs incorporate by reference every General Objection into each and every  
9 specific response to the Interrogatories set forth below. A specific response may repeat a General  
10 Objection for emphasis or some other reason. The failure to include any General Objection in any  
11 specific response shall in no way waive any General Objection to that Interrogatory.

#### 12 **OBJECTIONS TO DEFINITIONS**

13 Recognizing that parties generally may define terms as they wish for purposes of their  
14 discovery requests, Plaintiffs set forth below objections to Defendant's definitions for the reasons  
15 stated, which objections are applicable to each of Plaintiffs' specific objections and responses to the  
16 Interrogatories and are incorporated therein.

17 **DEFINITION NO. 1:** "Action" means the case entitled *Planned Parenthood Federation of*  
18 *America, et al v. Center for Medical Progress, et al.*, Case No. 3:16-cv-236-WHO, pending in the  
19 United States District Court for the Northern District of California.

20 **OBJECTIONS:** No specific objection.

21 **DEFINITION NO. 2:** "Identify" when used in reference to a person, means to give, to the  
22 extent known, the person's full name, present or last known address, and when referring to a natural  
23 person, additionally, his or her present or last known place of employment once a person has been  
24 identified in accordance with this subparagraph, only the full name of that person need be listed in  
25 response to subsequent discovery requesting the identification of that person.

26 **OBJECTIONS:** No specific objection.

27 **DEFINITION NO. 3:** "Identify the loss" means to provide sufficiently detailed information  
28 about an economic loss so as to make it possible to request documents related to the loss.



1 Normally, providing a brief description of the loss, the location and amount, and the vendor (for any  
2 sums paid to third parties) will be sufficient.

3 **OBJECTIONS:** No specific objection.

4 **DEFINITION NO. 4:** "Person" shall mean any individual, natural person, corporation,  
5 proprietorship, partnership, trust, association, firm, or any other entity.

6 **OBJECTIONS:** No specific objection.

7 **DEFINITION NO. 5:** "Plaintiffs" or "Plaintiff" means the plaintiffs in the above-styled  
8 action.

9 **OBJECTIONS:** No specific objection.

10 **DEFINITION NO. 6:** "Third party" or "third parties" refers to persons who are not a  
11 named party to this action.

12 **OBJECTIONS:** No specific objection.

13 **DEFINITION NO. 7:** "You," "your," and/or "yourselves" means each Plaintiff in this  
14 action including all predecessors, subsidiaries, parents, and affiliates, and all past or present  
15 directors, officers, employees, agents, attorneys, consultants, representatives, or other persons  
16 acting, or purporting to act, on behalf of, or at the direction of, a Plaintiff.

17 **OBJECTIONS:** No specific objection.

## 18 **INSTRUCTIONS**

19 **INSTRUCTION NO. 1:** If you object to answering a Interrogatory in whole or in part  
20 based on any privilege, please provide in a privilege log the information set forth in Federal Rule of  
21 Civil Procedure 26(b).

22 **OBJECTIONS:** Plaintiffs object to this Instruction to the extent that it conflicts with the  
23 agreement between the parties, as reflected in the Joint Case Management Statement filed March  
24 22, 2016 (ECF No. 57), that the parties are not required to list or otherwise identify any privileged  
25 material occurring on or after July 31, 2015. Plaintiffs will not produce a log for privileged material  
26 created after July 31, 2015.

27 **INSTRUCTION NO. 2:** If a Interrogatory cannot be answered or cannot be answered in  
28 full, it should be answered to the extent possible, with an explanation as to why the remainder

1 cannot be answered and a statement as to the nature of the information or knowledge that cannot be  
2 furnished. If Plaintiff knows the name of the person having any or all of the information sought by  
3 the Interrogatory, the name, address, telephone number, and the nature of the information known by  
4 such person shall be disclosed in Plaintiffs answer to the Interrogatory.

5 **OBJECTIONS:** Plaintiffs object to this Instruction on the grounds that it renders each  
6 Interrogatory overbroad, unduly burdensome, and disproportional to the needs of the case.  
7 Plaintiffs further object to this Instruction on the grounds that it imposes obligations in excess of the  
8 requirements of Fed. R. Civ. P. 33(b). In responding to these Requests, Plaintiffs will comply with  
9 their obligations under the Federal Rules of Civil Procedure.

10 **INSTRUCTION NO. 3:** If you have a good faith belief that a word, term, or phrase used in  
11 these Interrogatories is ambiguous, state that which you believe to be ambiguous, relate possible  
12 meanings you ascribe to the purportedly ambiguous word, term, or phrase, and provide answers to  
13 the question based on your various understandings of the purportedly ambiguous word, term, or  
14 phrase.

15 **OBJECTIONS:** Plaintiffs object to this Instruction on the grounds that it renders each  
16 Interrogatory overbroad and unduly burdensome. Plaintiffs further object to this Instruction on the  
17 grounds that it imposes obligations in excess of the requirements of Fed. R. Civ. P. 33(b).

18 **INSTRUCTION NO. 4:** These Interrogatories do not seek any confidential patient  
19 information or data required to be kept confidential by the Health Insurance Portability and  
20 Accountability Act ("HIPAA") or any State law governing medical privacy, including, but not  
21 limited to, patient names or any numbers that might identify any patient. These Interrogatories  
22 should be interpreted to include any aggregate data or data that does not contain uniquely  
23 identifiable information covered by HIPAA.

24 **OBJECTIONS:** Plaintiffs object to this Instruction on the grounds that it renders each  
25 Interrogatory overbroad, unduly burdensome, and disproportional to the needs of the case.  
26 Plaintiffs further object to this Instruction on the grounds that it imposes obligations in excess of the  
27 requirements of Fed. R. Civ. P. 33(b)(2). Plaintiffs further object to this Instruction to the extent  
28 that it imposes on Plaintiffs an obligation to create documents or records.

**INSTRUCTION NO. 5:** You are under a continuous obligation to supplement your answers to these Interrogatories under the circumstances specified in Federal Rule of Civil Procedure 26(e).

**OBJECTIONS:** Plaintiffs object to this Instruction to the extent it seeks to impose obligations in excess of the requirements of Fed. R. Civ. P. 26(e)(1). Plaintiffs will comply with their obligations under Fed. R. Civ. P. 26(e)(1) in that they will supplement or correct a response if Plaintiffs learn that “in some material respect the . . . response is incomplete or incorrect, and if the additional or corrective information has otherwise been made known to the other parties during the discovery process or in writing.”

## RESPONSE TO INTERROGATORIES

**INTERROGATORY NO. 20:**

State the specific amount of claimed damages that falls within each category (for instance, “cost of additional security including physical and IT-related to protect Plaintiffs’ offices, clinics, and staff”) that you set forth in your response to Interrogatory No. 3 in Plaintiffs’ October 28, 2016 Amended Response to Defendant Troy Newman’s First Set of Interrogatories.

**RESPONSE TO INTERROGATORY NO. 20:**

Plaintiffs incorporate by reference each General Objection and their Objections to Definitions into their Specific Objections to this Interrogatory. Plaintiffs object to this Interrogatory on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Plaintiffs further object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and the attorney work product doctrine. Plaintiffs further object to this Interrogatory to the extent that it seeks third-parties' private information that is protected from disclosure pursuant to the United States and California Constitutions. Plaintiffs object to this Request to the extent that it seeks Plaintiffs' information that is confidential, proprietary, private, or financial information. Plaintiffs further object to this Interrogatory to the extent it requests "specific amount of claimed damages" because discovery is ongoing. Plaintiffs further object to this Interrogatory to the extent it seeks premature disclosure of expert opinion and attorney work product. Plaintiffs have not decided on which expert witnesses may be called at trial. In responding to this Interrogatory, Plaintiffs do not waive work-product privilege or any other applicable privileges.

Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

Plaintiffs suffered damages in the following amounts for (1) physical and IT-related security costs, including costs related to safeguarding taped individuals; (2) cost of repairing, cleaning up, or replacing damages to buildings and personal property arising from vandalism, arson, and other security incidents; (4) lost revenue due to lost opportunity to treat patients due to the unavailability of the Planned Parenthood online appointment scheduling system because of a hack; (5) and other costs related to Defendants' wrongful conduct, staff time responding to the videos, security training for health center staff, and legal and other vendor fees. The damages provided here are an estimate based on information available so far and based on methodologies that may change pending the retention of experts. Moreover, discovery is ongoing, and Plaintiffs reserve the right to amend the responses to reflect either new information, categories of damages that are hereto unclaimed, or a change in the way damages are calculated.

	Damages	Grants Made or Received to Cover Damages	Net Total
PPFA	\$2,789,346.63	\$610,185.94	\$3,399,532.57
PPNorcal	\$467,705.07		\$467,705.07
PPMM	\$455,216.94	\$0	\$455,216.94
PPPSW	\$294,282.48	(\$56,491)	\$237,791.48
PPLA	\$557,278	(\$129,212)	\$428,066
PPOSBC	\$805,518.16	(\$6,000)	\$799,518.16
PPCCC	\$300,867	\$0	\$300,867
PPPSGV	\$425,760	(\$24,309)	\$401,451
PPGC/PPCFC	\$376,004.04	(\$36,941)	\$339,063.04

A detailed itemization of Plaintiffs' expenses is attached as Exhibit A.<sup>2</sup>

<sup>2</sup> PPRM seeks only injunctive relief

1  
2  
3 DATED: October 1, 2018

Respectfully submitted,

4 ARNOLD & PORTER KAYE SCHOLER LLP

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6 By:

  
Amy L. Bomse

7 Attorneys for Plaintiffs  
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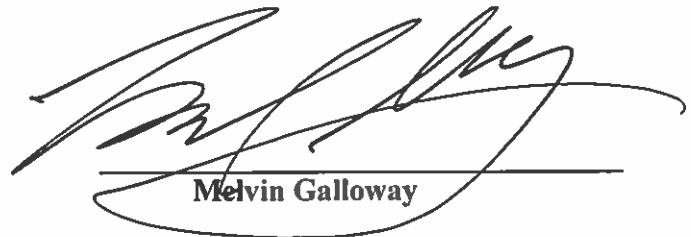
**VERIFICATION**

I, Melvin Galloway, declare as follows:

I am Chief Operating Officer of Planned Parenthood Planned Parenthood Federation of America, Inc. ("PPFA"). I am authorized to make this verification for and on behalf of PPFA in the above-captioned matter. I have read the **PLAINTIFFS' SECOND AMENDED RESPONSE TO DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES PROPOUNDED ON EACH PLAINTIFF** and know the contents thereof. Not all of the matters in those responses are within my personal knowledge, and I am informed and believe that no single officer or employee of PPFA has personal knowledge of all such matters. All facts stated in the above-referenced responses have been assembled by authorized employees and counsel of PPFA. I am informed and believe that the matters stated therein are true and correct, and on that basis verify the responses on behalf of PPFA, reserving the right, in the event new additional or different information is discovered, to revise or supplement the responses as warranted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 01 day of October, 2018 at New York, New York,



Melvin Galloway

**VERIFICATION**

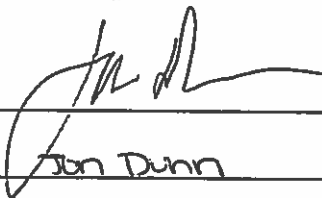
I, Jon Dunn declare as follows:

I am President / CEO of Planned Parenthood/Orange & San Bernardino Counties, Inc. ("PPOSBC"). I am authorized to make this verification for and on behalf of PPOSBC in the above-captioned matter. I have read **PLAINTIFF PLANNED PARENTHOOD/ORANGE AND SAN BERNARDINO COUNTIES, INC. FIRST AMENDED RESPONSES TO DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES** and know the contents thereof. Not all of the matters in those responses are within my personal knowledge, and I am informed and believe that no single officer or employee of PPOSBC has personal knowledge of all such matters. All facts stated in the above-referenced responses have been assembled by authorized employees and counsel of PPOSBC. I am informed and believe that the matters stated therein are true and correct, and on that basis verify the responses on behalf of PPOSBC, reserving the right, in the event new additional or different information is discovered, to revise or supplement the responses as warranted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1<sup>st</sup> day of October, 2018 at Orange, CA.

Print name

  
Jon Dunn

**VERIFICATION**

I, Tiana Riskowski declare as follows:

I am CEO of Planned Parenthood California Central Coast (formerly Planned Parenthood/Orange and San Bernardino Counties, Inc.) ("PPCCC"). I am authorized to make this verification for and on behalf of PPCCC in the above-captioned matter. I have read **PLAINTIFFS' SECOND AMENDED RESPONSE TO DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES PROPOUNDED ON EACH PLAINTIFF** and know the contents thereof. Not all of the matters in those responses are within my personal knowledge, and I am informed and believe that no single officer or employee of PPCCC has personal knowledge of all such matters. All facts stated in the above-referenced responses have been assembled by authorized employees and counsel of PPCCC. I am informed and believe that the matters stated therein are true and correct, and on that basis verify the responses on behalf of PPCCC, reserving the right, in the event new additional or different information is discovered, to revise or supplement the responses as warranted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27 day of September, 2018 at Santa Barbara.



Print name Tiana Riskowski




1 **VERIFICATION**

2 I, Sheri Bonner declare as follows:

3 I am President/CEO of Planned Parenthood Pasadena And San Gabriel Valley, Inc.  
4 ("PPPSGV"). I am authorized to make this verification for and on behalf of PPPSGV in the above-  
5 captioned matter. I have read **PLAINTIFFS' SECOND AMENDED RESPONSE TO**  
6 **DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES**  
7 **PROPOUNDED ON EACH PLAINTIFF** and know the contents thereof. Not all of the matters in  
8 those responses are within my personal knowledge, and I am informed and believe that no single  
9 officer or employee of PPPSGV has personal knowledge of all such matters. All facts stated in the  
10 above-referenced responses have been assembled by authorized employees and counsel of  
11 PPPSGV. I am informed and believe that the matters stated therein are true and correct, and on that  
12 basis verify the responses on behalf of PPPSGV, reserving the right, in the event new additional or  
13 different information is discovered, to revise or supplement the responses as warranted.

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

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17 Executed this 27 day of September, 2018 at 3:30 PM,

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21 Print name Sheri Bonner  
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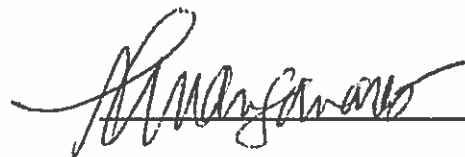
1 **VERIFICATION**

2 I, ADRIENNE MANSANARES, declare as follows:

3 I am Senior Vice President & Chief Experience Officer of Planned Parenthood Of The  
4 Rocky Mountains ("PPRM"). I am authorized to make this verification for and on behalf of PPRM  
5 in the above-captioned matter. I have read **PLAINTIFFS' SECOND AMENDED RESPONSE**  
6 **TO DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES**  
7 **PROPOUNDED ON EACH PLAINTIFF** and know the contents thereof. Not all of the matters in  
8 those responses are within my personal knowledge, and I am informed and believe that no single  
9 officer or employee of PPRM has personal knowledge of all such matters. All facts stated in the  
10 above-referenced responses have been assembled by authorized employees and counsel of PPRM. I  
11 am informed and believe that the matters stated therein are true and correct, and on that basis verify  
12 the responses on behalf of PPRM, reserving the right, in the event new additional or different  
13 information is discovered, to revise or supplement the responses as warranted.

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

16  
17 Executed this 1<sup>st</sup> day of October, 2018 at the City & County of Denver

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21 Print name: Adrienne Mansanares

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**VERIFICATION**

I, Sue Dunlap declare as follows:

I am President/CEO of Planned Parenthood Los Angeles ("PPLA"). I am authorized to make this verification for and on behalf of PPLA in the above-captioned matter. I have read **PLAINTIFFS' SECOND AMENDED RESPONSE TO DEFENDANT TROY NEWMAN'S SECOND SET OF INTERROGATORIES PROPOUNDED ON EACH PLAINTIFF** and know the contents thereof. Not all of the matters in those responses are within my personal knowledge, and I am informed and believe that no single officer or employee of PPLA has personal knowledge of all such matters. All facts stated in the above-referenced responses have been assembled by authorized employees and counsel of PPLA. I am informed and believe that the matters stated therein are true and correct, and on that basis verify the responses on behalf of PPLA, reserving the right, in the event new additional or different information is discovered, to revise or supplement the responses as warranted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28 day of September, 2018 at Los Angeles.



Print name Sue Dunlap

# EXHIBIT A

**PPFA Damages -- CONFIDENTIAL**

Category	Description	Invoice No.	Date	Amount	Subtotal
<b>SECURITY</b>	Security for Senior Staff	15-0959	12/01/15	\$11,400.00	\$59,860.00
		15-0556	08/01/15	\$18,600.00	
		15-0459	07/14/15	\$19,360.00	
		15-0957	12/16/15	\$400.00	
		15-0958	11/30/15	\$10,100.00	
	Guard services	16-0133	02/01/16	\$7,600.00	\$19,112.50
		16-0041	01/04/16	\$10,050.00	
		16-0036	01/24/16	\$1,462.50	
	Guard services	15274	10/01/15	\$434.00	\$75,881.00
		15291	10/15/15	\$3,660.00	
		15212	08/04/15	\$860.00	
		15199	07/13/15	\$27,070.50	
		15205	07/28/15	\$4,257.00	
		16066	03/07/16	\$1,333.00	
		16017	01/27/16	\$430.00	
		15353	12/10/15	\$9,255.50	
		15284	10/13/15	\$19,658.50	
		15251	09/21/15	\$1,763.00	
		15362	12/17/15	\$6,643.50	
		15352	12/09/15	\$516.00	
	Security for Senior Staff	15273	10/01/15	\$946.00	\$946.00
	Guard services	80000451	10/28/15	\$1,200.00	\$11,320.00
		50074594	08/12/15	\$2,750.00	
		5074475	07/29/15	\$4,620.00	
		50074450	08/05/15	\$2,750.00	

Security consulting services	2335840	08/07/15	\$23,094.80	\$144,684.82
	19902791	03/16/16	\$21.35	
	2336457	03/04/16	\$9,000.00	
	2336107	11/06/15	\$23,150.00	
	2335967	09/11/15	\$30,869.96	
	2335894	08/28/15	\$14,933.30	
	2335893	08/28/15	\$4,987.50	
	19902512	11/10/15	\$128.10	
	19902381	09/21/15	\$3,300.56	
	2336054	10/15/15	\$11,355.85	
	19902452	10/06/15	\$106.75	
	2335891	08/28/15	\$9,605.40	
	2335890	08/28/15	\$14,131.25	
Director of Security (Chris Berry)	2336479	03/08/16	\$13,911.25	\$138,087.35
	2336280	01/07/16	\$47,253.60	
	2336182	11/30/15	\$31,443.75	
	2336402	02/10/16	\$45,478.75	
Online threat assessments	2336619	04/22/16	\$8,175.00	\$44,228.00
	2336458	03/04/16	\$15,675.00	
	2336424	02/11/16	\$20,378.00	
Vetting practices reviews	15270	11/19/15	\$26,828.75	\$72,179.96
	15271	11/19/15	\$5,520.28	
	15272	11/19/15	\$3,591.25	
	15402	01/27/16	\$3,150.00	
	15322	12/11/15	\$6,490.30	
	16014	02/25/16	\$16,043.88	
	16070	04/05/16	\$10,555.50	
Interim security staff	16130	04/28/16	\$68,084.35	\$260,965.35
	16216	06/07/16	\$68,310.25	
	16196	06/07/16	\$66,627.75	
	16071	04/05/16	\$57,943.00	
Security consulting services	15182	10/07/15	\$67,440.00	\$119,672.50
	15156	10/02/15	\$41,230.00	
	15183	10/07/15	\$7,852.50	
	15404	01/27/16	\$3,150.00	
				<b>\$946,937.48</b>

PP Gulf Coast	CMP Security	07/29/15	\$19,493.00
	CMP Security Grant	07/01/15	\$17,448.00
Affiliate 38	CMP Security Grant	05/01/16	\$17,990.00
PP Los Angeles	CMP Security Grant	05/01/16	\$129,212.00
Affiliate 40	CMP Security Grant	07/29/15	\$6,000.00
Affiliate 13	CMP Security Grant	05/25/16	\$16,250.00
Affiliate 42	CMP Security Grant	05/01/16	\$9,000.00
Affiliate 37	CMP Security Grant	07/01/15	\$15,101.00
Affiliate 29	CMP Security Grant	05/01/16	\$10,000.00
Affiliate 47	CMP Security Grant	05/01/16	\$10,000.00
Affiliate 16	Affiliate Security Grant	03/01/16	\$28,000.00
PPOSBC	Security Grant	03/01/16	\$6,000.00
PPPSW	CMP Security	03/01/16	\$10,909.00
	CMP Security Grant	07/01/15	\$45,582.00
PPRM	Security Grants	03/01/16	\$202,706.94
		12/15/15	
		05/01/16	
Affiliate 41	CMP Security Grant	05/01/16	\$13,425.00
PPSGV	CMP Security Grant	05/01/16	\$10,000.00
	CMP Security Grant	07/01/15	\$14,309.00
Affiliate 21	Affiliate Security Improvement Grant	05/01/16	\$18,691.00

**\$610,185.94**

**TOTAL GRANTS MADE**

**\$610,185.94**

**NET TOTAL DAMAGES**

**\$3,399,532.57**



IT SECURITY	Immediate response to CMP-inspired hacking attack on Planned Parenthood IT platforms	89233	07/31/15	\$181,987.25	\$1,253,500.20
		Ref 1A	08/03/15	\$50,000.00	
		89912	08/31/15	\$415,975.93	
		89917	08/31/15	\$325,000.00	
		90691	09/30/15	\$86,167.00	
		91060	09/30/15	\$43,608.17	
		91625	10/31/15	\$11,342.40	
		92059	10/31/15	\$90,124.60	
		92799	11/30/15	\$12,630.80	
		92812	11/30/15	\$15,277.80	
		93829	12/31/15	\$16,983.75	
		95797	02/29/16	\$1,725.00	
		97468	04/30/16	\$2,677.50	
		Securing IT platforms directly affected by CMP-inspired	94994	01/31/16	
	95836		02/29/16	\$10,577.50	
	96424		03/31/16	\$8,108.75	
	Monitoring for continued hacking threats	91843	10/31/15	\$58,355.00	\$191,163.95
		94168	12/31/15	\$32,065.00	
		94820	01/31/16	\$24,880.00	
		95837	02/29/16	\$42,423.73	
		96811	03/31/16	\$33,440.22	
	Web Properties Support	91412	09/30/15	\$66,666.00	\$146,958.75
		92060	10/31/15	\$14,361.50	
		92696	11/30/15	\$53,687.50	
		94201	12/31/15	\$12,243.75	
					\$1,625,309.15
STAFF TIME	Staff Time Related to Responding to Aftermath of Videos' Release			\$ 217,100.00	\$ 217,100.00
TOTAL COSTS					\$ 2,789,346.63
GRANTS TO AFFILIATES	Affiliate (See Response to Rhomberg IROG 19)	Description	Date	Amount	
	Affiliate 5	CMP Security Grant	03/01/16	\$7,909.00	
		ACEC Fight Back Security Grant	07/01/15	\$2,160.00	

the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million (1990–2000) and is projected to increase by a further 1.5 million by 2020 (Office for National Statistics 2001).

There is a growing awareness of the need to improve the health and well-being of older people, and the importance of preventing and reducing the burden of disease and disability. The World Health Organization (WHO) has identified the need for a 'new paradigm' in health care for older people, one that is based on a holistic approach to health and well-being, and that takes into account the social, psychological, and physical aspects of health (WHO 1999). The WHO has also identified the need for a 'new paradigm' in health care for older people, one that is based on a holistic approach to health and well-being, and that takes into account the social, psychological, and physical aspects of health (WHO 1999).

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## PPNorCal Damages -- CONFIDENTIAL

Category	Description	Invoice No.	Date	Amount	Subtotal
SECURITY - PHYSICAL & IT	Physical Security Enhancement Projects	12251604	12/25/16	\$2,928.50	\$138,261.70
		12251605	12/25/16	\$2,688.00	
		12251601	12/25/16	\$2,688.00	
		12251602	12/25/16	\$2,688.00	
		11011601	11/01/16	\$2,525.00	
		08081603*	08/08/16	\$158.91	
		08081623	08/08/16	\$2,134.00	
		06281625	06/28/16	\$14,508.00	
		06131603	06/07/16	\$7,596.80	
		06271602	06/27/16	\$3,571.86	
		04251602*	04/25/16	\$300.00	
		03071605	03/07/16	\$2,852.13	
		02291603	02/29/16	\$14,365.00	
		02291601	02/29/16	\$20,500.00	
		02161601	02/16/16	\$13,500.00	
		02161602	02/16/16	\$5,150.00	
		12311519*	12/31/15	\$400.00	
		12151502*	12/15/15	\$480.00	
		12151520*	12/15/15	\$577.50	
		10201514	10/20/15	\$38,650.00	
	Camera and Access Control	2031601	02/03/16	\$14,275.00	\$121,298.00
		3211601	03/21/16	\$1,865.00	
		3211602	03/21/16	\$375.00	
		4051601	04/05/16	\$1,850.00	
		5191601	05/19/16	\$2,600.00	
		5191603	05/19/16	\$7,800.00	
		5191602	05/16/16	\$5,200.00	
		6111601	06/11/16	\$650.00	
		4151601	04/15/16	\$1,745.00	
		6171602	06/17/16	\$11,587.00	
		6171601	06/17/16	\$3,731.00	
		6121601	06/12/16	\$13,984.00	
		9221603	09/22/16	\$2,400.00	
		9221601	09/22/16	\$2,400.00	
		1071601	10/07/16	\$2,400.00	
		11101602	11/10/16	\$4,704.00	
		11101603	11/10/16	\$650.00	
		11101601	11/10/16	\$5,289.00	
		11231602	11/08/16	\$7,200.00	
		11171601	11/17/16	\$8,535.00	
		11171602	11/17/16	\$2,050.00	
		11231603	11/23/16	\$4,800.00	
		12201601	12/20/16	\$9,008.00	
		11231604	11/23/16	\$4,800.00	
		11231601	11/23/16	\$650.00	
		12181501	12/18/15	\$750.00	
	Security Software	ZK29296	09/30/15	\$39,998.20	\$39,998.20

Dual-Factor Authentication Software Licenses	48077	09/04/15	\$90.00	\$10,501.31
	48804	09/10/15	\$71.63	
	50735	09/25/15	\$87.30	
	51253	09/29/15	\$9.48	
	51930	10/04/15	\$750.00	
	53663	10/17/15	\$86.90	
	55952	11/04/15	\$900.00	
	60154	12/04/15	\$900.00	
	61064	12/11/15	\$118.17	
	64280	01/04/16	\$525.00	
	68831	02/04/16	\$450.00	
	69204	02/07/16	\$68.49	
	73506	03/04/16	\$525.00	
	83395	05/04/16	\$525.00	
	88428	06/04/16	\$525.00	
	88942	06/06/16	\$69.34	
	94196	07/04/16	\$600.00	
	105964	09/04/16	\$600.00	
	112285	10/04/16	\$600.00	
	118790	11/04/16	\$600.00	
	125450	12/04/16	\$600.00	
	132346	01/04/17	\$600.00	
	139495	02/04/17	\$600.00	
	146650	03/04/17	\$600.00	
* = not all invoiced items claimed as damages				\$310,059.21
OTHER COSTS RELATING TO DEFENDANTS' ACTS	Staff Time to Respond to Aftermath of Videos' Release		\$48,041.86	\$48,041.86
	Active Shooter Training		\$109,604.00	\$109,604.00
				\$157,645.86
<b>TOTAL DAMAGES</b>				<b>\$467,705.07</b>

the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million (1990–1999) and is projected to increase by a further 1.5 million by 2010 (Office of National Statistics 2000).

There is a growing awareness of the need to develop strategies to meet the needs of the ageing population. The Department of Health (1999) has identified the need to develop a 'new paradigm' of care for the ageing population. This paradigm is based on the principle of 'active ageing', which is defined as 'the process of optimising the opportunities for people to be able to live independently, to participate in the life of their community, and to fulfil their potential' (Department of Health 1999, p. 10). The Department of Health (1999) has identified a number of key areas for action in order to achieve this paradigm, including: (1) the need to develop a 'new paradigm' of care for the ageing population; (2) the need to develop a 'new paradigm' of care for the ageing population; (3) the need to develop a 'new paradigm' of care for the ageing population.

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PPMM DAMAGES -- CONFIDENTIAL				
Category	Description	Date	Amount	Subtotal
SECURITY - PHYSICAL & IT	Security Director time spent responding fielding security questions related to videos		\$2,967.54	\$2,967.54
	Security Enhancement - Cameras	1/1/2017	\$474.76	\$182,565.02
		1/1/2017	\$474.76	
		1/3/2017	\$569.71	
		1/18/2017	\$474.76	
		1/24/2017	\$284.86	
		1/25/2017	\$617.19	
		1/25/2017	\$474.76	
		1/25/2017	\$759.62	
		1/30/2017	\$664.67	
		1/31/2017	\$569.71	
		2/7/2017	\$854.57	
		2/15/2017	\$474.76	
		2/21/2017	\$854.57	
		2/21/2017	\$284.86	
		2/22/2017	\$617.19	
		2/22/2017	\$474.76	
		2/22/2017	\$759.62	
		2/9/2017	\$287.31	
		2/9/2017	\$335.19	
		2/10/2017	\$287.31	
		2/21/2017	\$379.81	
		2/23/2017	\$383.08	
		4/1/2017	\$335.19	
		6/14/2017	\$474.76	
		2/9/2017	\$670.38	
		2/22/2017	\$622.50	
		2/22/2017	\$143.65	
		3/20/2017	\$335.19	
		3/21/2017	\$284.86	
		3/21/2017	\$379.81	
		4/1/2017	\$854.57	
		4/1/2017	\$670.38	
		4/1/2017	\$287.31	
		4/1/2017	\$617.19	
		4/1/2017	\$759.62	
		4/1/2017	\$383.08	
		4/1/2017	\$143.65	
		4/1/2017	\$622.50	
		4/1/2017	\$383.08	
		4/1/2017	\$664.67	
		4/1/2017	\$526.73	
		4/1/2017	\$191.54	

2/27/2017	\$664.67
2/27/2017	\$526.73
2/27/2017	\$430.96
2/28/2017	\$191.54
3/1/2017	\$335.19
3/2/2017	\$287.31
3/8/2017	\$287.31
3/13/2017	\$191.54
3/13/2017	\$383.08
3/13/2017	\$287.31
3/14/2017	\$239.42
3/15/2017	\$191.54
3/17/2017	\$287.31
3/27/2017	\$430.96
3/28/2017	\$569.71
3/29/2017	\$335.19
3/30/2017	\$287.31
4/4/2017	\$854.57
1/25/2017	\$383.08
3/22/2017	\$190.00
4/5/2017	\$287.31
4/6/2017	\$670.38
4/6/2017	\$335.19
4/6/2017	\$287.31
4/7/2017	\$287.31
4/10/2017	\$287.31
4/10/2017	\$191.54
4/10/2017	\$383.08
4/12/2017	\$190.00
4/11/2017	\$239.42
4/12/2017	\$474.76
4/12/2017	\$191.54
4/18/2017	\$284.86
4/19/2017	\$474.76
4/19/2017	\$383.08
4/14/2017	\$287.31
4/17/2017	\$335.19
4/18/2017	\$379.81
4/19/2017	\$617.19
4/19/2017	\$759.62
4/19/2017	\$143.65
4/19/2017	\$622.50
4/20/2017	\$383.08
4/24/2017	\$664.67
4/24/2017	\$526.73
4/24/2017	\$430.96
4/25/2017	\$569.71

4/25/2017	\$191.54
4/26/2017	\$335.19
4/27/2017	\$287.31
3/28/2017	\$47.88
4/25/2017	\$47.88
1/26/2017	\$474.76
2/17/2017	\$190.00
2/20/2017	\$335.19
2/22/2017	\$383.08
2/27/2017	\$190.00
2/28/2017	\$569.71
3/15/2017	\$474.76
12/23/2016	\$474.76
1/5/2017	\$474.76
3/2/2017	\$474.76
4/27/2017	\$474.76
3/22/2017	\$474.76
5/2/2017	\$854.57
5/3/2017	\$287.31
5/4/2017	\$670.38
5/4/2017	\$335.19
5/4/2017	\$287.31
5/5/2017	\$287.31
5/8/2017	\$191.54
5/8/2017	\$287.31
5/8/2017	\$383.08
5/9/2017	\$239.42
5/10/2017	\$191.54
5/12/2017	\$287.31
5/15/2017	\$335.19
5/16/2017	\$284.86
5/16/2017	\$379.81
5/17/2017	\$617.19
5/17/2017	\$759.62
5/17/2017	\$143.65
5/17/2017	\$383.08
12/29/2016	\$474.76
1/26/2017	\$430.96
1/31/2017	\$95.77
2/2/2017	\$474.76
2/8/2017	\$383.08
2/23/2017	\$430.96
2/28/2017	\$95.77
2/28/2017	\$47.88
3/8/2017	\$383.08
3/23/2017	\$430.96
3/28/2017	\$95.77



3/30/2017	\$474.76
4/5/2017	\$383.08
4/20/2017	\$474.76
4/23/2017	\$190.00
4/25/2017	\$95.77
5/3/2017	\$383.08
5/10/2017	\$474.76
5/17/2017	\$622.50
5/18/2017	\$474.76
5/18/2017	\$430.96
5/18/2017	\$383.08
5/22/2017	\$664.67
5/22/2017	\$526.73
5/22/2017	\$430.96
5/23/2017	\$569.71
5/23/2017	\$95.77
5/23/2017	\$47.88
5/23/2017	\$191.54
5/24/2017	\$335.19
5/25/2017	\$474.76
5/25/2017	\$287.31
5/30/2017	\$854.57
5/31/2017	\$287.31
5/31/2017	\$383.08
6/1/2017	\$287.31
6/1/2017	\$335.19
6/1/2017	\$670.38
6/2/2017	\$287.31
6/5/2017	\$191.54
6/5/2017	\$287.31
6/5/2017	\$383.08
6/6/2017	\$239.42
6/7/2017	\$191.54
1/3/2017	\$334.21
1/31/2017	\$334.21
3/15/2017	\$191.54
4/25/2017	\$334.21
5/10/2017	\$191.54
5/17/2017	\$474.76
6/12/2017	\$335.19
6/13/2017	\$379.81
6/14/2017	\$143.65
6/14/2017	\$622.50
6/14/2017	\$759.62
6/14/2017	\$617.19
6/15/2017	\$430.96
6/15/2017	\$383.08

6/19/2017	\$664.67
6/19/2017	\$526.73
6/26/2017	\$287.31
2/28/2017	\$334.21
3/23/2017	\$474.76
3/28/2017	\$334.21
4/12/2017	\$191.54
5/23/2017	\$334.21
6/14/2017	\$383.08
6/19/2017	\$430.96
6/20/2017	\$569.71
6/20/2017	\$95.77
6/21/2017	\$335.19
6/22/2017	\$287.31
6/28/2017	\$383.08
6/28/2017	\$287.31
7/3/2017	\$287.31
6/20/2017	\$191.54
7/7/2017	\$287.31
7/10/2017	\$335.19
7/11/2017	\$284.86
7/3/2017	\$383.08
3/9/2017	\$287.31
4/20/2017	\$430.96
4/12/2017	\$191.54
6/7/2017	\$191.54
6/13/2017	\$284.86
6/15/2017	\$474.76
6/20/2017	\$334.21
6/20/2017	\$47.88
6/22/2017	\$474.76
6/27/2017	\$854.57
6/29/2017	\$335.19
6/29/2017	\$670.38
6/29/2017	\$287.31
6/30/2017	\$287.31
7/3/2017	\$191.54
7/4/2017	\$239.42
7/5/2017	\$474.76
7/5/2017	\$191.54
7/5/2017	\$191.54
7/6/2017	\$239.42
7/11/2017	\$379.81
7/12/2017	\$474.76
7/12/2017	\$617.19
7/12/2017	\$759.62
7/12/2017	\$383.08

7/12/2017	\$143.65
7/12/2017	\$622.50
7/13/2017	\$474.76
7/13/2017	\$430.96
7/17/2017	\$664.67
7/17/2017	\$526.73
7/17/2017	\$430.96
7/18/2017	\$334.21
7/18/2017	\$569.71
7/18/2017	\$95.77
7/18/2017	\$47.88
7/18/2017	\$191.54
7/20/2017	\$474.76
7/20/2017	\$287.31
7/25/2017	\$854.57
7/27/2017	\$335.19
7/27/2017	\$287.31
7/31/2017	\$383.08
7/31/2017	\$287.31
8/1/2017	\$474.76
7/13/2017	\$383.08
8/4/2017	\$287.31
8/7/2017	\$335.19
8/8/2017	\$284.86
8/9/2017	\$617.19
8/10/2017	\$430.96
8/15/2017	\$334.21
8/15/2017	\$569.71
8/15/2017	\$95.77
8/9/2017	\$474.76
8/9/2017	\$383.08
8/10/2017	\$474.76
8/16/2017	\$335.19
7/19/2017	\$335.19
7/27/2017	\$670.38
7/28/2017	\$287.31
7/31/2017	\$191.54
8/3/2017	\$239.42
8/9/2017	\$622.50
8/10/2017	\$383.08
8/14/2017	\$430.96
8/15/2017	\$191.54
8/15/2017	\$47.88
9/4/2017	\$335.19
9/5/2017	\$284.86
9/5/2017	\$379.81
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9/6/2017	\$759.62
9/6/2017	\$143.65
9/6/2017	\$622.50
9/7/2017	\$430.96
9/7/2017	\$383.08
9/11/2017	\$526.73
9/12/2017	\$334.21
9/12/2017	\$569.71
9/12/2017	\$95.77
7/26/2017	\$383.08
7/26/2017	\$287.31
8/1/2017	\$239.42
8/2/2017	\$474.76
8/2/2017	\$191.54
8/2/2017	\$191.54
8/8/2017	\$379.81
8/17/2017	\$474.76
8/17/2017	\$287.31
8/22/2017	\$854.57
8/23/2017	\$287.31
8/24/2017	\$335.19
8/24/2017	\$670.38
8/24/2017	\$287.31
8/25/2017	\$287.31
8/28/2017	\$287.31
8/28/2017	\$191.54
8/28/2017	\$383.08
8/30/2017	\$474.76
8/30/2017	\$191.54
8/31/2017	\$239.42
9/1/2017	\$287.31
9/6/2017	\$617.19
9/6/2017	\$474.76
9/7/2017	\$474.76
9/11/2017	\$430.96
9/12/2017	\$191.54
9/12/2017	\$47.88
9/13/2017	\$335.19
9/14/2017	\$474.76
9/14/2017	\$287.31
9/19/2017	\$854.57
9/20/2017	\$383.08
9/20/2017	\$287.31
9/21/2017	\$670.38
9/21/2017	\$335.19
9/21/2017	\$287.31
9/22/2017	\$287.31

9/25/2017	\$287.31
9/25/2017	\$191.54
9/25/2017	\$383.08
9/26/2017	\$239.42
9/27/2017	\$474.76
9/27/2017	\$191.54
9/27/2017	\$191.54
9/28/2017	\$239.42
9/29/2017	\$287.31
10/2/2017	\$335.19
10/3/2017	\$284.86
10/3/2017	\$379.81
10/4/2017	\$474.76
10/4/2017	\$617.19
10/4/2017	\$759.62
10/4/2017	\$383.08
10/4/2017	\$143.65
10/4/2017	\$622.50
10/5/2017	\$474.76
10/5/2017	\$383.08
10/5/2017	\$430.96
10/9/2017	\$664.67
10/9/2017	\$526.73
10/9/2017	\$430.96
10/10/2017	\$334.21
10/10/2017	\$569.71
10/10/2017	\$95.77
10/10/2017	\$191.54
10/10/2017	\$47.88
10/11/2017	\$338.88
10/12/2017	\$289.85
10/17/2017	\$864.01
10/18/2017	\$387.41
10/18/2017	\$290.02
10/19/2017	\$677.93
10/19/2017	\$338.88
10/19/2017	\$290.46
10/20/2017	\$290.37
10/23/2017	\$290.11
10/23/2017	\$387.41
10/23/2017	\$193.70
10/24/2017	\$241.84
10/25/2017	\$480.15
10/25/2017	\$193.64
10/25/2017	\$193.52
10/26/2017	\$242.13
10/27/2017	\$290.19

10/30/2017	\$338.57
10/31/2017	\$287.74
8/9/2017	\$143.65
8/14/2017	\$664.67
8/14/2017	\$526.73
8/23/2017	\$383.08
9/11/2017	\$664.67
10/31/2017	\$383.20
11/1/2017	\$145.10
11/6/2017	\$532.69
11/6/2017	\$435.69
11/7/2017	\$575.29
11/7/2017	\$334.21
11/7/2017	\$48.43
11/7/2017	\$96.85
11/7/2017	\$193.70
11/8/2017	\$338.88
11/14/2017	\$864.01
8/9/2017	\$759.62
10/12/2017	\$480.15
11/1/2017	\$479.57
11/1/2017	\$623.24
11/1/2017	\$767.32
11/1/2017	\$387.41
11/1/2017	\$629.52
11/2/2017	\$479.35
11/2/2017	\$435.83
11/2/2017	\$387.63
11/6/2017	\$670.59
11/9/2017	\$289.85
11/15/2017	\$387.41
11/15/2017	\$290.02
11/16/2017	\$677.93
11/16/2017	\$290.46
11/16/2017	\$338.88
11/17/2017	\$290.37
11/20/2017	\$193.70
11/20/2017	\$290.11
11/20/2017	\$387.41
11/21/2017	\$241.84
11/22/2017	\$193.64
11/22/2017	\$193.52
11/23/2017	\$242.13
11/24/2017	\$290.19
11/27/2017	\$338.57
11/28/2017	\$287.74
11/28/2017	\$383.20

11/29/2017	\$479.57
11/29/2017	\$623.24
11/29/2017	\$767.32
11/29/2017	\$145.10
11/29/2017	\$387.41
11/29/2017	\$629.52
11/30/2017	\$435.83
11/30/2017	\$387.63
12/4/2017	\$670.59
12/4/2017	\$532.69
12/4/2017	\$435.69
12/5/2017	\$96.85
12/5/2017	\$193.70
12/5/2017	\$48.43
12/6/2017	\$338.88
12/7/2017	\$289.85
12/13/2017	\$387.41
12/13/2017	\$290.02
12/14/2017	\$677.93
12/14/2017	\$290.46
12/14/2017	\$338.88
12/15/2017	\$290.37
12/18/2017	\$193.70
12/18/2017	\$290.11
12/18/2017	\$387.41
12/20/2017	\$193.64
12/20/2017	\$193.52
8/29/2017	\$239.42
12/19/2017	\$241.84
12/25/2017	\$338.57
12/27/2017	\$629.52
1/1/2018	\$532.69
1/2/2018	\$48.43
1/2/2018	\$193.70
1/3/2018	\$338.88
2/23/2017	\$474.76
11/9/2017	\$480.15
11/22/2017	\$480.15
11/30/2017	\$479.35
12/5/2017	\$334.21
12/5/2017	\$575.29
12/12/2017	\$864.01
12/21/2017	\$242.13
12/22/2017	\$290.19
12/26/2017	\$287.74
12/26/2017	\$383.20
12/27/2017	\$479.57

		12/27/2017	\$623.24	
		12/27/2017	\$767.32	
		12/27/2017	\$387.41	
		12/27/2017	\$145.10	
		12/28/2017	\$435.83	
		12/28/2017	\$479.35	
		12/28/2017	\$387.63	
	IT Security Enhancement - Staff Time	Various	\$13,098.46	\$196,197.21
	IT Security Enhancement - Anti-malware software	06/30/16	\$7,500.00	
	IT Security Enhancement - Firewall	05/02/16	\$164,446.19	
	It Security Enhancement - Staff Time to address OAS hack	Various	\$11,152.56	
				<b>\$381,729.77</b>
<b>VANDALISM, PROTESTS &amp; SECURITY INCIDENTS</b>	Graffiti Removal	08/16/15	\$600.00	\$10,292.34
	Protest - Staff Time	07/28/15	\$1,165.64	
	Protest - Staff Time	08/22/15	\$4,352.91	
	Protest - Staff Time	09/10/15	\$1,276.79	
	Protest - Security Guards	09/10/15	\$760.00	
	Protest - Staff Time	10/10/15	\$2,137.00	
				<b>\$10,292.34</b>
<b>OTHER COSTS RELATING TO DEFENDANTS' ACTS</b>	Staff Education in response to videos <sup>1</sup>			\$63,194.83
				<b>\$63,194.83</b>
<b>TOTAL COSTS</b>				<b>\$455,216.94</b>
	Description	Date	Amount	Subtotal
<b>GRANTS FROM PPFA RELATED TO CMP</b>	None			\$ -
<b>TOTAL GRANTS RECEIVED</b>				<b>\$0.00</b>
<b>NET TOTAL DAMAGES</b>				<b>\$455,216.94</b>

**Footnote:** <sup>1</sup>Includes expenses incurred by the Director of Security relating to the trainings, and staff time (2.0 hours) attending the trainings. Evidence of participation to be





**PPPSW Damages-- CONFIDENTIAL**

Category	Description	Invoice No.	Date	Invoice Amount	Claimed Amount
SECURITY	Physical security	65587	02/08/16	\$2,756.32	\$58,483.00
		68119	05/25/16	\$2,638.94	
		67533	05/16/16	\$3,344.27	
		67550	05/16/16	\$2,328.19	
		67393	05/04/16	\$1,704.43	
		65708	02/23/16	\$2,274.88	
		66896	04/06/16	\$3,891.45	
		65653	02/17/16	\$1,573.03	
		67546	05/16/16	\$1,299.84	
		67320	03/31/16	\$4,522.67	
		67391	05/04/16	\$2,179.87	
		66299	03/10/16	\$991.49	
		67318	04/26/16	\$1,295.81	
		66497	03/22/16	\$10,908.41	
		67392	05/04/16	\$2,185.86	
		67388	05/03/16	\$4,182.52	
		67390	05/03/16	\$3,547.52	
		67389	05/03/16	\$1,586.54	
		67387	05/03/16	\$5,270.96	
	Executive Protection/Event Security	n/a	08/22/17	\$52,260.00	\$146,900.37
		70155	10/21/16	\$6,038.14	
		70083	10/10/16	\$21,280.06	
		70156	10/21/16	\$6,787.76	
		89007	07/25/16	\$20,248.47	
		71507	01/13/17	\$2,103.10	
		68592	06/28/16	\$9,999.00	
		69608	08/29/16	\$8,718.04	
		70052	10/03/16	\$5,891.60	
		69109	08/16/16	\$13,574.20	
	Annual Dinner Security Costs	239835	10/31/15	\$485.63	\$9,727.26
		241156	03/30/16	\$9,094.63	
		241157	03/30/16	\$147.00	
	Security response to national fetal tissue donation protests*	239163	08/31/15	\$29,643.62	\$9,111.16
		239837	10/31/15	\$28,291.31	
		241442	04/30/16	\$33,559.60	

Category	Description	Invoice No.	Date	Invoice Amount	Claimed Amount
	Security response to protest activity and security incidents*	238901	07/31/15	\$24,174.19	\$2,974.40
		239162	08/31/15	\$9,726.75	
		239163	08/31/15	\$29,643.62	
		239454	09/30/15	\$28,973.50	
		239837	10/31/15	\$28,291.31	
		240180	11/30/15	\$725.76	
		240173	11/30/15	\$29,558.52	
		240389	12/31/15	\$30,941.63	
		240928	02/29/16	\$31,891.19	
		241176	03/31/16	\$33,332.83	
		241442	04/30/16	\$33,559.60	
		241764	05/31/16	\$31,580.48	
		242563	07/31/16	\$30,536.81	
	Increased patrols of contracted security*	238901	07/31/15	\$24,174.19	\$28,371.20
		239163	08/31/15	\$29,643.62	
		239454	09/30/15	\$28,973.50	
		239837	10/31/15	\$28,291.31	
		240173	11/30/15	\$29,558.52	
		240389	12/31/15	\$30,941.63	
		240672	01/31/16	\$31,699.49	
		240928	02/29/16	\$31,891.19	
		241176	03/31/16	\$33,332.83	
	PPPSW Security Staff Time	n/a	n/a	\$10,201.62	\$12,354.12
		n/a	n/a	\$2,152.50	
	Director of Business Continuity, Emergency Management, and Security Time	n/a	n/as	\$5,300.40	\$5,300.40
	Contracted security trainings	240172	11/30/15	\$8,213.70	\$8,213.70
	PPPSW Employees' Training for Active Shooter - Salary Expense	n/a	n/a	\$12,846.87	\$12,846.87
					<b>\$294,282.48</b>

\* = not all items on Invoice counted in Claimed Amount

<b>TOTAL COSTS</b>					<b>\$294,282.48</b>
	Description		Date	Amount	Subtotal
<b>GRANTS FROM PPFA RELATED TO CMP</b>	Security costs associated with increased opposition activity		7/1/2015	\$ 45,582	\$ 45,582
	Necessary security systems at a health center		3/1/2016	\$ 10,909	\$ 10,909
<b>TOTAL GRANTS RECEIVED</b>					<b>\$56,491.00</b>
<b>NET TOTAL DAMAGES</b>					<b>\$237,791.48</b>

the 1990s, the number of people in the UK who are employed in the public sector has increased by 1.5 million, from 2.5 million in 1980 to 4 million in 1999. The public sector has grown from 10% of the economy to 15% of the economy.

There is a growing emphasis on the need to improve the efficiency of the public sector. This has led to a number of initiatives, including the introduction of competition, the restructuring of public services, and the introduction of performance targets. The aim of these initiatives is to reduce the cost of public services and to improve the quality of the services provided.

One of the main challenges facing the public sector is the need to reduce the cost of public services. This is a difficult task, as public services are often provided at a loss. However, there are a number of ways in which the cost of public services can be reduced. These include the introduction of competition, the restructuring of public services, and the introduction of performance targets.

The introduction of competition is one of the most common ways in which the cost of public services can be reduced. This involves the introduction of private companies into the public sector. These companies are then able to compete with each other for contracts, which helps to reduce the cost of the services provided.

The restructuring of public services is another way in which the cost of public services can be reduced. This involves the merging of public services and the elimination of duplication. This helps to reduce the cost of the services provided and to improve the quality of the services provided.

The introduction of performance targets is a third way in which the cost of public services can be reduced. This involves the setting of targets for the performance of public services. These targets are then used to measure the performance of public services and to identify areas for improvement.

There are a number of other ways in which the cost of public services can be reduced. These include the introduction of new technologies, the restructuring of public services, and the introduction of performance targets. These initiatives are all aimed at reducing the cost of public services and improving the quality of the services provided.

The public sector is a vital part of the economy and it is important that it is able to provide high quality services at a reasonable cost. The initiatives described above are all aimed at achieving this goal and it is hoped that they will be successful in the future.

**PPLA DAMAGES**

Category	Description	Date	Amount	Subtotal
SECURITY - PHYSICAL & IT	Security guards for each of 20 health centers	08/28/15	\$772.24	\$426,496.98
		08/28/15	\$972.16	
		08/28/15	\$865.48	
		08/28/15	\$394.24	
		08/28/15	\$806.40	
		08/29/15	\$756.00	
		08/28/15	\$742.00	
		12/11/15	\$1,610.00	
		12/18/15	\$630.00	
		12/18/15	\$521.08	
		12/18/15	\$518.00	
		12/18/15	\$347.76	
		12/18/15	\$1,470.00	
		12/18/15	\$406.00	
		12/18/15	\$210.00	
		12/18/15	\$422.80	
		12/18/15	\$252.00	
		12/18/15	\$252.00	
		12/18/15	\$420.00	
		12/18/15	\$266.00	
		12/18/15	\$266.00	
		12/18/15	\$196.00	
		12/18/15	\$266.00	
		12/19/15	\$518.00	
		12/19/15	\$28.00	
		12/19/15	\$263.76	
		12/25/15	\$1,246.00	
		12/25/15	\$266.00	
		12/25/15	\$298.76	
		12/25/15	\$266.00	
		01/01/16	\$1,395.00	
		01/01/16	\$1,155.00	
		01/01/16	\$280.00	
		01/01/16	\$266.00	
		12/05/15	\$1,143.24	
		12/11/15	\$590.24	
		12/11/15	\$1,228.64	
		12/11/15	\$1,431.64	
		12/11/15	\$1,562.68	
		12/11/15	\$1,316.00	
		12/11/15	\$1,484.00	
		12/12/15	\$1,579.20	
		12/11/15	\$1,288.00	
		12/11/15	\$1,527.40	
		12/12/15	\$1,677.48	
		12/12/15	\$1,344.00	
		12/11/15	\$1,587.60	
		12/11/15	\$1,498.00	

12/12/15	\$1,500.24
12/12/15	\$1,484.00
12/12/15	\$1,540.00
12/12/15	\$1,575.00
12/04/15	\$294.00
12/04/15	\$1,243.20
12/04/15	\$1,176.00
12/04/15	\$540.00
12/04/15	\$1,092.00
12/04/15	\$1,067.36
12/04/15	\$1,157.24
12/04/15	\$1,234.24
12/04/15	\$1,101.24
12/05/15	\$1,305.00
12/05/15	\$1,332.24
12/05/15	\$1,316.00
12/05/15	\$1,040.76
12/05/15	\$1,176.56
12/05/15	\$1,127.00
12/05/15	\$1,148.00
12/05/15	\$1,050.00
12/05/15	\$1,164.52
12/05/15	\$1,095.92
12/05/15	\$1,265.88
02/05/16	\$1,463.00
02/06/16	\$284.76
02/06/16	\$266.00
02/06/16	\$1,431.00
11/20/15	\$1,309.00
11/20/15	\$210.00
11/20/15	\$277.76
11/27/15	\$1,204.00
11/28/15	\$280.00
11/28/15	\$266.00
11/20/15	\$378.00
11/06/15	\$1,800.00
11/06/15	\$1,330.00
11/07/15	\$196.00
11/07/15	\$284.76
11/07/15	\$1,395.00
11/13/15	\$1,390.76
11/14/15	\$284.76
11/14/15	\$70.00
10/23/15	\$926.24
10/23/15	\$728.00
10/23/15	\$980.00
10/23/15	\$718.76
10/23/15	\$784.00
10/23/15	\$728.00

10/23/15	\$728.00
10/23/15	\$196.00
10/23/15	\$851.76
10/23/15	\$728.00
10/23/15	\$1,526.00
10/23/15	\$708.40
10/23/15	\$728.00
10/23/15	\$756.00
10/23/15	\$989.80
10/23/15	\$840.00
10/23/15	\$931.00
10/23/15	\$728.00
10/23/15	\$736.12
10/23/15	\$1,493.24
10/31/15	\$296.24
10/30/15	\$0.00
10/02/15	\$1,658.44
10/02/15	\$1,530.76
10/02/15	\$1,522.92
10/02/15	\$1,994.16
10/02/15	\$1,516.76
10/02/15	\$1,932.00
10/02/15	\$1,484.00
10/02/15	\$648.76
10/03/15	\$1,484.00
10/03/15	\$1,519.00
10/03/15	\$585.00
10/03/15	\$1,691.48
10/03/15	\$1,570.24
10/03/15	\$1,484.00
10/03/15	\$1,514.52
10/03/15	\$1,598.24
10/03/15	\$1,569.40
10/03/15	\$1,551.76
10/03/15	\$1,409.24
10/03/15	\$1,460.76
10/09/15	\$625.24
10/09/15	\$1,558.76
10/09/15	\$1,925.00
10/09/15	\$1,470.00
10/09/15	\$1,491.84
10/09/15	\$1,645.84
10/09/15	\$1,661.52
10/09/15	\$1,512.00
10/09/15	\$1,484.00
10/09/15	\$1,901.48
10/10/15	\$1,580.04
10/10/15	\$1,471.96
10/10/15	\$1,479.24
10/10/15	\$1,740.48

10/10/15	\$1,538.88
10/10/15	\$1,535.24
10/10/15	\$1,484.00
10/10/15	\$1,652.00
10/10/15	\$1,553.16
10/16/15	\$709.52
10/16/15	\$1,773.24
10/16/15	\$1,498.28
10/16/15	\$2,003.40
10/16/15	\$1,483.72
10/16/15	\$1,672.72
10/16/15	\$1,575.00
10/16/15	\$1,952.16
10/17/15	\$1,498.00
10/17/15	\$1,589.00
10/17/15	\$1,484.28
10/17/15	\$1,465.52
10/17/15	\$1,597.96
10/17/15	\$1,540.28
10/17/15	\$1,589.00
10/17/15	\$1,514.24
10/17/15	\$1,484.00
10/17/15	\$1,484.00
10/17/15	\$1,670.76
10/10/15	\$0.00
09/25/15	\$1,572.48
10/02/15	\$1,658.44
09/25/15	\$2,323.72
09/25/15	\$2,049.88
09/11/15	\$1,663.20
09/11/15	\$620.76
09/11/15	\$1,134.56
09/11/15	\$714.00
09/11/15	\$1,302.00
09/11/15	\$1,148.00
09/18/15	\$1,540.00
09/18/15	\$1,512.00
09/18/15	\$1,491.00
09/18/15	\$1,540.56
09/18/15	\$1,031.24
09/18/15	\$1,712.76
09/18/15	\$1,540.00
09/19/15	\$1,544.20
09/19/15	\$1,391.88
09/19/15	\$1,672.72
09/19/15	\$1,325.24
09/19/15	\$1,484.00
09/19/15	\$1,305.36
09/19/15	\$1,650.04
09/19/15	\$1,608.60



09/19/15	\$1,589.00
09/19/15	\$1,500.24
09/19/15	\$1,624.00
09/25/15	\$1,596.00
09/25/15	\$1,598.24
09/25/15	\$1,484.00
09/25/15	\$1,512.00
09/25/15	\$1,557.92
09/25/15	\$1,484.00
09/25/15	\$1,530.76
09/25/15	\$613.76
09/25/15	\$1,533.00
09/25/15	\$1,484.00
09/25/15	\$1,531.04
09/25/15	\$1,711.08
09/25/15	\$1,525.16
09/25/15	\$1,479.24
09/25/15	\$2,049.88
09/25/15	\$2,323.72
09/25/15	\$1,668.24
09/25/15	\$1,473.64
09/25/15	\$1,711.08
09/11/15	\$756.00
09/11/15	\$767.76
09/11/15	\$756.00
09/11/15	\$756.00
09/11/15	\$1,484.00
09/11/15	\$777.00
09/12/15	\$816.76
09/12/15	\$1,176.00
09/12/15	\$882.00
09/12/15	\$352.24
09/12/15	\$812.00
09/12/15	\$261.24
09/12/15	\$786.24
09/04/15	\$1,484.00
09/04/15	\$1,465.24
09/04/15	\$639.24
09/04/15	\$1,552.04
09/04/15	\$1,587.60
09/04/15	\$1,760.36
09/04/15	\$1,556.52
08/01/15	\$849.34
08/11/15	\$1,556.25
08/11/15	\$1,412.50
08/11/15	\$1,425.00
08/11/15	\$706.65
08/11/15	\$1,350.00
08/11/15	\$1,418.75
08/11/15	\$1,356.25

08/11/15	\$629.25
08/11/15	\$1,287.50
08/11/15	\$1,188.00
08/11/15	\$1,325.00
08/11/15	\$1,350.00
08/11/15	\$1,437.50
08/11/15	\$1,517.00
08/11/15	\$816.47
08/11/15	\$1,025.00
08/11/15	\$1,379.00
08/25/15	\$1,425.00
08/18/15	\$568.75
08/18/15	\$1,350.00
08/18/15	\$1,350.00
08/18/15	\$820.81
08/18/15	\$1,420.75
08/25/15	\$543.75
08/25/15	\$1,425.00
08/25/15	\$699.36
08/25/15	\$1,358.75
08/25/15	\$1,350.00
08/25/15	\$1,350.00
08/25/15	\$1,491.75
08/25/15	\$1,491.25
08/25/15	\$1,350.00
08/25/15	\$1,350.00
08/25/15	\$1,187.50
08/25/15	\$1,375.00
08/25/15	\$1,425.00
08/25/15	\$1,489.50
08/25/15	\$1,387.50
08/25/15	\$1,081.25
08/25/15	\$1,367.50
08/25/15	\$605.82
08/18/15	\$1,651.25
08/18/15	\$1,350.00
08/18/15	\$1,425.00
08/18/15	\$1,289.50
08/18/15	\$1,187.50
08/18/15	\$1,425.00
08/18/15	\$1,350.00
08/18/15	\$1,325.00
08/18/15	\$1,477.00
08/18/15	\$1,300.00
08/18/15	\$1,506.25
08/18/15	\$1,466.75
08/06/15	\$675.00
08/06/15	\$850.00
08/25/15	\$1,537.50
08/31/15	\$1,387.50

08/31/15	\$525.00
08/31/15	\$1,475.00
08/31/15	\$450.00
08/31/15	\$1,125.00
08/31/15	\$1,187.50
08/31/15	\$650.00
08/31/15	\$1,265.50
08/31/15	\$1,358.25
08/31/15	\$1,187.50
08/31/15	\$1,350.00
08/31/15	\$675.00
08/31/15	\$1,216.50
08/31/15	\$650.00
08/31/15	\$676.46
08/31/15	\$349.88
08/31/15	\$1,187.50
09/08/15	\$840.88
09/08/15	\$1,350.00
09/08/15	\$1,325.00
09/08/15	\$1,340.25
09/08/15	\$712.50
09/08/15	\$1,290.00
09/08/15	\$1,350.00
08/31/15	\$655.66
07/21/15	\$127.49
07/21/15	\$757.91
07/22/15	\$320.00
07/28/15	\$1,411.50
07/28/15	\$1,062.50
07/28/15	\$1,350.00
07/28/15	\$1,558.75
07/28/15	\$701.26
07/28/15	\$900.00
07/28/15	\$900.00
07/28/15	\$1,262.50
07/28/15	\$1,248.00
07/28/15	\$900.00
07/28/15	\$1,200.00
07/28/15	\$1,237.50
07/28/15	\$900.00
07/28/15	\$1,387.50
07/28/15	\$830.49
07/28/15	\$1,400.00
07/31/15	\$1,337.50
07/31/15	\$1,325.00
07/31/15	\$1,495.75
07/31/15	\$1,422.75
07/31/15	\$1,075.00
07/31/15	\$1,543.75
07/31/15	\$1,350.00

		07/31/15	\$1,431.25	
		07/31/15	\$806.16	
		07/31/15	\$1,350.00	
		07/31/15	\$1,125.00	
		07/31/15	\$1,350.00	
		07/31/15	\$1,412.50	
		07/31/15	\$554.25	
		07/31/15	\$785.64	
		07/31/15	\$1,470.00	
		07/31/15	\$1,175.00	
		07/31/15	\$1,481.25	
		09/08/15	\$1,493.75	
		09/15/15	\$425.00	
		09/15/15	\$475.00	
		09/08/15	\$1,493.75	
		09/15/15	\$425.00	
		09/15/15	\$475.00	
		09/15/15	\$412.50	
		09/15/15	\$433.25	
		09/15/15	\$450.00	
		09/15/15	\$116.56	
		09/15/15	\$475.00	
		09/15/15	\$451.25	
		09/15/15	\$443.75	
		09/15/15	\$450.00	
		09/15/15	\$450.00	
		09/08/15	\$898.00	
		09/15/15	\$475.00	
		11/18/15	\$71,154.66	\$117,067.55
		11/18/15	\$15,474.00	
		12/10/15	\$15,503.89	
		08/10/15	\$12,685.00	
		08/20/15	\$2,250.00	
				<b>\$543,564.53</b>
OTHER COSTS RELATING TO DEFENDANTS' ACTS	Grief/stress hotline for staff	01/15/16	\$13,712.50	\$13,712.50
				<b>\$13,712.50</b>
TOTAL COSTS				<b>\$557,277.03</b>
		Description	Date	Amount
				Subtotal
GRANTS FROM PPFA RELATED TO CMP	CMP Security Grant	05/01/16	\$129,212.00	\$129,212.00
TOTAL GRANTS RECEIVED				<b>\$129,212.00</b>
NET TOTAL DAMAGES				<b>\$428,065.03</b>



**PPOSBC Damages -- CONFIDENTIAL**

Category	Description	Invoice/Doc No.	Date	Amount	Subtotal
SECURITY	Security Guard for [REDACTED]	16-303	03/07/16	\$2,520.00	\$3,060
		16-304	03/09/16	\$540.00	
	Security System [REDACTED]	1134	03/10/16	\$1,089.00	\$3,789.00
		445 AX	03/10/16	\$2,700.00	
	Online Threat Security Monitoring for Senior Staff	Check # 115233	08/18/15	\$6,000.00	\$12,000.00
		Check # 118670	07/01/16	\$6,000.00	
	Additional Security for Organized Protests	8132	08/24/15	\$2,000.00	\$4,960.00
		8291	11/01/15	\$2,000.00	
		16-1004*	10/17/16	\$960.00	
	Night Guard for Orange County Health Center	8362	02/01/16	\$6,696.00	\$92,016.00
		8385	03/01/16	\$6,048.00	
		C-8432	04/01/16	\$6,696.00	
		8435	05/01/16	\$6,480.00	
		8458	06/01/16	\$6,696.00	
		8491	07/01/16	\$6,480.00	
		8506	08/07/16	\$6,696.00	
		8527	09/01/16	\$6,696.00	
		8562	10/01/16	\$6,480.00	
		8555	11/01/16	\$6,696.00	
		8304	12/01/15	\$6,480.00	
		8578	12/01/16	\$6,480.00	
		8339	01/01/16	\$6,696.00	
		9600	01/01/17	\$6,696.00	
	Security Improvements	n/a	04/04/16	\$20,472.48	\$71,039.16
		n/a	06/16/16	\$23,985.72	
		n/a	12/16/15	\$26,580.96	
	Access Control System for Administrative Office	n/a	06/16/16	\$7,855.92	\$7,855.92
	Security Windows	25386	03/11/16	\$787.00	\$51,716.00
		26303	06/23/16	\$28,085.00	
		25989	05/20/16	\$2,015.00	
		25785	04/25/16	\$3,632.00	
		25714	04/19/16	\$3,360.00	
		25759	04/25/16	\$1,887.00	
		25474	03/08/16	\$2,800.00	
		25543	03/14/18	\$9,150.00	
	Threat Alert System	PMN22302016	06/21/16	\$11,438.50	\$11,438.50
	Security Enhancements to San Bernadino Clinic	n/a	12/07/16	\$2,688.12	\$43,353.15
		1503*	01/12/17	\$40,665.03	
	Additional Security Guards	8305	12/01/15	\$1,200.00	\$1,680.00
		16-403	04/11/16	\$480.00	

Category	Description	Invoice/Doc No.	Date	Amount	Subtotal
SECURITY	Physical Security Enhancements	1760	03/24/16	\$68,100.93	\$416,053.93
		1763	04/06/16	\$63,544.00	
		1783	05/06/16	\$140,232.50	
		1752	06/05/16	\$75,882.85	
		1814	07/30/16	\$44,637.65	
		1859	10/18/16	\$23,656.00	
	IT Penetration Testing	1754	11/02/16	\$5,660.00	\$5,660.00
	Firewall	PBOSBC32885	08/24/15	\$2,218.99	\$4,437.98
			09/30/15	\$2,218.99	
	Patient Record Security System Enhancements	INV023488	12/29/15	\$34,758.75	\$69,858.18
		INV023489	12/30/15	\$1,405.21	
		INV024559	03/14/16	\$2,803.40	
		Q-00091132	03/11/16	\$2,580.00	
		Q-00101410	04/08/16	\$6,450.00	
		Q-00096585	04/06/16	\$12,600.00	
		PPOSBC36364	03/07/16	\$4,060.32	
		PBOSBC35608	01/25/16	\$1,600.00	
	Dual-Factor Authentication Upgrade	17380498	10/12/16	\$3,600.00	\$3,639.00
		8682714	12/01/16	\$39.00	
					\$802,556.82
CLEAN UP FROM VANDALISM	Replace broken window at Orange, CA location	24596	10/11/15	\$2,961.34	
					\$2,961.34
* = not all items counted in Amount					
TOTAL COSTS					\$805,518.16
	Description		Date	Amount	Subtotal
GRANTS FROM PPFA RELATED TO CMP	Affiliate's security improvements and costs		3/1/2016	\$ 6,000	\$ 6,000
TOTAL GRANTS RECEIVED					\$6,000.00
NET TOTAL DAMAGES					\$799,518.16

the 'information' and 'communication' fields. The 'information' field is defined as:

...the study of the nature, structure, and use of information, and the study of the processes of information creation, distribution, and use, and the study of the social, cultural, and economic aspects of information. (p. 1)

The 'communication' field is defined as:

...the study of the nature, structure, and use of communication, and the study of the processes of communication creation, distribution, and use, and the study of the social, cultural, and economic aspects of communication. (p. 1)

The 'information science' field is defined as:

...the study of the nature, structure, and use of information science, and the study of the processes of information science creation, distribution, and use, and the study of the social, cultural, and economic aspects of information science. (p. 1)

The 'information studies' field is defined as:

...the study of the nature, structure, and use of information studies, and the study of the processes of information studies creation, distribution, and use, and the study of the social, cultural, and economic aspects of information studies. (p. 1)

The 'information technology' field is defined as:

...the study of the nature, structure, and use of information technology, and the study of the processes of information technology creation, distribution, and use, and the study of the social, cultural, and economic aspects of information technology. (p. 1)

The 'information systems' field is defined as:

...the study of the nature, structure, and use of information systems, and the study of the processes of information systems creation, distribution, and use, and the study of the social, cultural, and economic aspects of information systems. (p. 1)

The 'information management' field is defined as:

...the study of the nature, structure, and use of information management, and the study of the processes of information management creation, distribution, and use, and the study of the social, cultural, and economic aspects of information management. (p. 1)

The 'information policy' field is defined as:

...the study of the nature, structure, and use of information policy, and the study of the processes of information policy creation, distribution, and use, and the study of the social, cultural, and economic aspects of information policy. (p. 1)

The 'information law' field is defined as:

...the study of the nature, structure, and use of information law, and the study of the processes of information law creation, distribution, and use, and the study of the social, cultural, and economic aspects of information law. (p. 1)



**PPCCC DAMAGES**

Category	Description	Date	Amount	Subtotals
SECURITY - PHYSICAL & IT	Security alarm system enhancement	11/15/15	\$1,393.77	\$24,507.99
		03/31/16	\$402.26	
		05/15/16	\$1,393.77	
		04/15/16	\$495.00	
		05/27/16	\$180.65	
		07/15/16	\$495.00	
		08/15/16	\$1,542.24	
		10/15/16	\$495.00	
		11/15/16	\$1,542.24	
		11/30/16	\$562.66	
		12/15/16	\$1,582.47	
		12/23/15	\$113.23	
		01/15/16	\$195.00	
		04/15/16	\$195.00	
		05/15/16	\$416.00	
		06/15/16	\$90.00	
		07/15/16	\$105.00	
		10/15/16	\$105.00	
		12/15/16	\$172.74	
		12/15/16	\$153.55	
		12/18/15	\$200.65	
		04/15/16	\$195.00	
		05/15/16	\$210.00	
		07/15/16	\$195.00	
		08/15/16	\$210.00	
		10/15/16	\$195.00	
		11/15/16	\$210.00	
		12/31/16	\$71.13	
		12/31/16	\$118.55	
		12/15/15	\$350.07	
		12/31/15	\$1,194.36	
		12/31/15	\$108.06	
		01/15/16	\$135.00	
		04/15/16	\$317.52	
		07/15/16	\$135.00	
		07/31/16	\$1,145.06	
		09/15/16	\$601.56	
		10/15/16	\$135.00	
		12/15/16	\$86.94	
		12/15/16	\$601.56	
		12/31/16	\$333.55	

		10/15/15	\$703.89	
		02/16/16	\$210.63	
		03/15/16	\$210.63	
		04/15/16	\$1,407.78	
		05/15/16	\$368.39	
		06/15/16	\$240.63	
		07/31/16	\$31.94	
		09/15/16	\$285.63	
		07/15/16	\$703.89	
		10/15/16	\$320.00	
		09/15/16	\$285.63	
		12/15/16	\$938.52	
		12/15/16	\$420.84	
	Photo Scan System	09/04/15	\$4,541.40	\$25,436.00
		09/07/15	\$4,541.40	
		10/08/15	\$4,541.40	
		10/08/15	\$4,541.40	
		10/13/15	\$4,541.40	
		12/10/15	\$2,729.00	
	Lighting at Thousand Oaks Health Center	02/19/16	\$15,352.00	\$15,352.00
	IT security enhancements	03/03/16	\$6,839.78	\$124,076.53
		03/03/16	\$36,833.34	
		08/21/15	\$683.47	
		09/22/15	\$225.00	
		10/06/15	\$10,331.17	
		10/07/15	\$1,275.00	
		11/16/15	\$582.27	
		11/24/15	\$1,139.61	
		12/02/15	\$4,477.02	
		12/02/15	\$1,459.77	
		02/05/16	\$4,313.22	
		02/05/16	\$15,261.93	
		02/05/16	\$8,024.25	
		02/05/16	\$10,693.35	
		03/16/16	\$21,937.35	
				<b>\$189,372.52</b>
<b>VANDALISM, PROTESTS &amp;</b>	Window vandalism	08/29/15	\$1,750.00	\$8,471.05

SECURITY INCIDENTS		08/29/15	\$6,721.05	
				<b>\$8,471.05</b>
LOSS OF PATIENT REVENUE DUE TO HACK	Reduced patient volumes due to patient portal disruption			\$85,353.95
				<b>\$85,353.95</b>
OTHER COSTS RELATING TO DEFENDANTS' ACTS	Staff time spent responding to videos and security training			\$17,668.55
				<b>\$17,668.55</b>
<b>TOTAL COSTS</b>				<b>\$300,866.07</b>
<b>NET TOTAL DAMAGES</b>				<b>\$300,866.07</b>



**PPPSGV DAMAGES**

Category	Description	Date	Amount	Subtotals
SECURITY - PHYSICAL & IT	██████ Auditor	7/10/2017	\$4,867.96	\$4,867.96
	████████████████████	12/16/2015	\$208.63	\$10,523.78
		4/28/2016	\$7,950.00	
		11/12/2016	\$500.00	
		2/7/2017	\$1,865.15	
	██████ Audit	4/20/2017	\$2000.00	\$7,899.26
		3/30/2017	\$2000.00	
		10/6/2016	\$649.26	
		8/25/2016	\$3250.00	
	██████ Firewalls	4/1/2016	\$15,725.88	\$15,725.88
	██████ End-Point	9/25/2015	\$3,589.80	\$3,589.80
	Installation of fence, gate, and security landscaping at the Pasadena Health Center	01/04/17	\$3,000.00	\$26,522.54
		02/01/17	\$746.00	
		02/11/17	\$959.00	
		03/01/17	\$965.50	
		03/15/17	\$5,211.50	
		04/01/17	\$7,536.29	
		04/15/17	\$3,720.63	
		05/03/17	\$3,869.14	
		05/15/17	\$324.49	
		06/01/17	\$189.99	
		05/09/17	\$12,000.00	\$155,125.00
		05/30/17	\$28,000.00	

	06/29/17	\$28,000.00	
	08/16/17	\$28,000.00	
	09/21/17	\$28,688.00	
	12/07/17	\$23,392.00	
	01/29/18	\$7,045.00	
	03/20/18	\$19,673.00	\$39,345.00
	03/20/18	\$19,672.00	
	02/21/18	\$18,077.04	\$37,051.04
	02/27/18	\$18,077.00	
	02/28/18	\$897.00	
	04/01/18	\$4,000.00	\$4,000.00
Wireless Duress Buttons all sites	05/10/17	\$339.89	\$339.89
Badge Reader Eagle Rock	08/08/17	\$475.37	\$475.37
Lock Down Button in Glendora	10/31/16	\$1,902.57	\$1,902.57
Security Film Alhambra	07/14/17	\$750.00	\$1,500.00
	08/02/17	\$750.00	

Security Film Glendora	07/14/17	\$875.00	\$1,750.00
	08/01/17	\$875.00	
Security Film Pasadena & Ridder House	11/29/17	\$4,025.00	\$4,875.00
	03/07/18	\$850.00	
Security Film Eagle Rock Waiting Room	12/15/17	\$2,772.00	\$2,772.00
Security Film Eagle Rock Reception Window	02/15/18	\$430.00	\$1,485.00
	02/22/18	\$430.00	
	03/19/18	\$625.00	
Half Day Security Guard for Pasadena Health Center on Saturdays due to protesters	11/02/16	\$1,080.00	\$1,080.00
	02/24/17	\$120.00	\$120.00
Security Guard	11/30/16	\$600.00	\$840.00
	12/19/16	\$240.00	
Purchase and installation of new lighting and security cameras and control system at Pasadena Health Center	12/05/16	\$2,580.99	\$9,585.79
	08/24/15	\$415.00	
	02/09/16	\$888.18	
	11/02/16	\$700.87	
	10/11/16	\$2,615.84	
	40 hrs	\$1,224.40	
	10 hrs	\$451.10	
	11/03/16	\$709.41	
Private security for Medical Director in July 2015	08/05/15	\$6,105.00	\$6,105.00
Increased security for Fall Benefit	10/17/16	\$765.00	\$765.00
Increased security for three separate protests in September/October 2015	08/24/15	\$360.00	\$1,590.00
	10/13/15	\$510.00	

		11/24/15	\$720.00	
Security training for staff (including Staff Time)		12/10/15	\$114.55	\$2,348.68
		12/11/15	\$255.33	
		12/14/15	\$135.32	
		12/15/15	\$237.06	
		12/16/15	\$369.67	
		12/17/15	\$1,236.75	
Reputation.com subscription for Senior Staff		10/13/15	\$3,000.00	\$6,000.00
		10/16/15	\$3,000.00	
Full time security guards for all health centers (November/December 2015)		12/07/15	\$8,595.00	\$16,477.50
		12/14/15	\$7,762.50	
		12/22/15	\$120.00	
Full time security guard at Pasadena Health Center (December 2015 - July 2016)		02/08/16	\$2,471.25	\$5,838.75
		05/03/16	\$2,722.50	
		08/02/16	\$645.00	
Increased security at fall benefit, October 2015		10/06/15	\$2,155.00	\$2,155.00
Security Guard at Pasadena Health Center		11/30/16	\$600.00	\$600.00
		12/19/16	\$240.00	\$240.00
				<b>\$357,769.93</b>
<b>LOSS OF PATIENT REVENUE DUE TO HACK</b>	Reduced patient volumes due to patient portal disruption		\$39,023.00	\$39,023.00
				<b>\$39,023.00</b>
<b>OTHER COSTS RELATING TO DEFENDANTS' ACTS</b>	Revenue lost due to security training		\$4,745.00	\$4,745.00
	Extra Staffing During National Protest - senior leaders sent to support/help, escort patients, etc.	10/10/15	\$2,471.76	\$2,471.76



	Security Manager job - majority of time spent responding to security concerns related to CMP for 6 months after release of videos	n/a	\$21,750.00	\$21,750.00
				<b>\$28,966.76</b>
<b>TOTAL COSTS</b>				<b>\$425,759.69</b>
	Description	Date	Amount	Subtotal
GRANTS FROM PPFA RELATED TO CMP	CMP Security Grant	05/01/16	\$10,000.00	\$24,309.00
	CMP Security Grant	7/?/2015	\$14,309.00	
<b>NET TOTAL DAMAGES</b>				<b>\$401,450.69</b>



PPGC DAMAGES -- CONFIDENTIAL				
Category	Description	Date	Amount	Subtotal
SECURITY - PHYSICAL & IT	Security guard for Staff	08/26/15	\$5,520	\$5,520
	Camera system for Staff	08/25/15	\$11,927.95	\$11,927.95
	Moving camera system for Staff	11/11/16	\$2,759.98	\$2,759.98
	ASC Security System Addition	12/02/15	\$1,168.98	\$1,168.98
		01/18/16	\$3,425.14	\$3,425
	Staff Home Security System	01/28/16	\$408.64	\$408.64
	Window enclosures at Intake	07/01/16	\$46,651.00	\$46,651.00
				<b>\$71,861.69</b>
STATE INVESTIGATIONS	Total legal fees for services related to investigations	11/12/2015	\$26,498.75	\$96,262.50
		12/30/2015	\$49,397.50	
		1/19/2016	\$3,420.00	
		2/12/2016	\$9,515.00	
		4/21/2016	\$2,475.00	
		4/22/2016	\$2,671.25	
		5/31/2016	\$1,295.00	
		7/21/2016	\$618.75	
		8/24/2016	\$247.50	
		1/19/2017	\$123.75	
		8/6/2015	\$396.50	\$17,346.69
		11/9/2015	\$1,680.00	
		1/11/2016	\$4,404.67	
		2/23/2016	\$4,189.83	
		12/31/2016	\$3,028.37	
		1/24/2017	\$1,977.27	
		6/20/2017	\$1,189.82	
		8/14/2017	\$326.90	
		9/19/2017	\$153.33	
		11/23/2015	\$1,975.60	\$1,975.60
		8/18/2015	\$2,000.00	\$57,701.57
		8/26/2015	\$10,000.00	
		11/1/2015	\$5,000.00	
		5/25/2016	\$7,500.00	
			-\$938.22	
		1/12/2017	\$22,326.79	
		8/28/2015	\$1,000.00	
		8/28/2015	\$10,000.00	
		12/3/2015	\$9,835.00	
			-\$9,022.00	
		11/20/2015	\$2,220.99	\$2,220.99
		8/14/2015	\$2,372.00	\$5,435.00
		5/31/2016	\$315.00	
		9/26/2016	\$2,748.00	
				<b>\$180,942.35</b>
OTHER COSTS RELATING TO DEFENDANTS' ACTS	Staff time stemming from CMP video release		\$123,200.00	\$123,200.00
				<b>\$123,200.00</b>
<b>TOTAL COSTS</b>				<b>\$376,004.04</b>
	Description	Date	Amount	Subtotal
GRANTS FROM PPFA RELATED TO CMP	CMP Security Grant	7/1/2015	\$17,448	\$17,448
	CMP Security Grant	7/29/2015	\$19,493	\$19,493
<b>TOTAL GRANTS RECEIVED</b>				<b>\$36,941.00</b>
<b>NET TOTAL DAMAGES</b>				<b>\$339,063.04</b>

# **EXHIBIT 8**

Planned Parenthood Gulf Coast

March 9, 2016

**DOE1010**

Senior Director, Affiliate Administrative Operations  
Planned Parenthood Federation of America,

Dear **DOE1010**

As we move forward after the Center for Medical Progress (CMP) smear videos, and the Colorado Springs shooting, and the indictments of CMP actors, we have taken a second and third look at our security needs to determine what can be enhanced.

We brought in Mark Mellor from National Abortion Federation to evaluate our headquarters and a physician's new home, and to meet with staff so they could share concerns about their safety. We also had Houston Police Department SWAT leadership walk through our headquarters and look at our policies, protocols, and facilities. The indictments of the CMP actors were a boost to morale and led to a feeling of vindication for staff and supporters, yet it enraged opposition and elevated our security concerns.

We began to implement many of the recommendations from experts, none of which were included in this year's budget.

The NAF suggestions included:

- adding a camera to the **REDACTED FOR SECURITY**
- adding an access control card reader between **REDACTED FOR SECURITY**
- add glass windows **REDACTED FOR SECURITY** where we currently have pull down metal shutters, but the area is otherwise open (we have written a separate foundation grant request to cover this expense, which may be in the \$150,000 - \$200,000 range)
- change a lock on one of the physicians doors at her home, and add peepholes

In addition to the NAF recommendation for Houston, we have made other enhancements that came from staff concerns and opposition activity. In Baton Rouge, a family planning only center, we had a protester come into the clinic to confront staff about videos, have had #ProtestPP activities, and overall have had increased protester and general opposition activity in the last year. Law enforcement has expressed concerns about some of the tactics used and discussed by opposition. In December, we added cameras on the **REDACTED FOR SECURITY**. We are moving to a new location later this year, and the cameras will be transferred to that site once completed.

Houston Police were very impressed with our facility design, and protocols **REDACTED FOR SECURITY**

**REDACTED FOR SECURITY**

Planned Parenthood Gulf Coast

The costs to increase security needs after the video releases, Colorado Springs and the indictments breaks down as follows:

Card reader	\$	3,425.14
Camera	\$	1,168.98
Locksmith at [DOE9004]	\$	408.64
Baton Rouge cameras	\$	13,490.38
[REDACTED FOR SECURITY]	\$	1,000.00

The total cost is \$19,493.14.

I continue to appreciate the advice, support, and assistance from you and [DOE1012]. We all had a challenging 2015, but I am hopeful for 2016 and a pendulum swing to the direction of reason.

Sincerely,



Melaney Linton,  
President and Chief Executive Officer  
Planned Parenthood Gulf Coast.